
Colorado Environmental Performance Partnership Agreement

FY2015 End of Year Assessment

An Assessment of Environmental Accomplishment and
Challenges for the Period of October 1, 2014 through
September 30, 2015

December 2015



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1.0 Introduction to the End of Year Assessment

The Colorado Environmental Performance Partnership Agreement (CEPPA) is an agreed-to plan between the Colorado Department of Public Health and Environment and Region 8 of the Environmental Protection Agency to address environmental issues and problems in Colorado. It reflects commitments made by both agencies to environmental management.

The CEPPA document:

- 1) Defines the roles of the Colorado Department of Public Health and Environment (CDPHE) and Region VIII EPA;
- 2) Identifies the overall priorities for environmental protection in Colorado; and,
- 3) Describes what the state and federal environmental program efforts will be to protect air, water and the land.

The FY2015 CEPPA includes work plans (environmental health/sustainability, air, water, and waste) funded, in part, from the Performance Partnership Grant (PPG) as a part of the comprehensive environmental program plan for Colorado. The purpose of this report is to describe the program accomplishments for the grant period from October 1, 2014 through September 30, 2015.

This report also is intended to fulfill the requirement of the PPG program grant awarded to the state by EPA for an end-of-year assessment. This was conducted during the period of November through December 2015 by the CDPHE Environmental Programs. Areas assessed include all program activities and accomplishments for all media. This report will be used, along with other guidance, as part of the ongoing PPA update process.

This report is intended to provide an overview of the progress of environmental management in addressing air, water and waste issues in Colorado.

This assessment was completed by CDPHE program staff and to some degree by EPA Region 8. This assessment is part of the continuing cycle of interagency planning and implementation to address the major environmental concerns in Colorado.

2.0 Division of Environmental Health and Sustainability - FY2015 Work Plan Status and Accomplishments

SUSTAINABILITY PROGRAM			
SUPPLEMENTAL ENVIRONMENTAL PROJECTS			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities; Goal 4-Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws			
Subgoals	Objectives	Timeline	Status and Accomplishments
Support and advise Cross-Media Enforcement Team (CMET) on SEP related issues.	Review SEP and Eligible Governmental Entity policies annually and make recommendations to CMET as needed.	Annually	SEP policy reviewed
Increase efficacy and efficiency of SEP program	As requested by environmental divisions: coordinate directly with the enforcement action respondent to present SEP policy and assist in finding appropriate SEP ideas; analyze and evaluate SEP proposals; track project progress and interim deadlines; and review SEP Completion Reports.	Ongoing	<p>Finalized 9 SEP agreements that include at least one SEP totaling \$367,615</p> <p>1,083 hits on SEP webpage</p> <p>662 hits on SEP Community Process website</p> <p>15 SEP Completion Reports reviewed and approved</p>
	Administer SEP idea database; develop and administer the department's SEP website; develop annual SEP Report to track environmental outcomes from SEPs.	Ongoing	<p>19 new SEP ideas included in database</p> <p>Environmental and public health outcomes from SEPs are tracked using an internal Sharepoint site and available at any time upon request.</p>
SUSTAINABILITY PROGRAM			
CROSS-MEDIA AND SECTOR INITIATIVES			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws			
Subgoals	Objectives	Timeline	Status and Accomplishments

Assist with CDPHE innovations and cross-media approaches.	Coordinate compliance assistance efforts between programs, including sharing information, data and referring facilities.	Ongoing	ELP coordinated with environmental divisions to share information and conduct compliance checks.
	Cross-train compliance assistance providers.	Ongoing	Training tracked by each division.
	Continue to hold regular workgroup meetings to discuss cross-media opportunities.	Ongoing	Cross Media Innovations and Strategies Team (CMIST) held quarterly meetings. The team has been working on local rural priorities project and a coal tar sealant project.
	Environmental Results Program		For details refer to Water Quality Control Division and Hazardous Materials and Waste Management Division chapters.
Integrate successful initiatives into traditional environmental programs.	Integrate Environmental Results Program into environmental divisions.	Ongoing	For details refer to Water Quality Control Division and Hazardous Materials and Waste Management Division chapters.
SUSTAINABILITY PROGRAM			
EMERGING ENVIRONMENTAL ISSUES			
Supports EPA 2011-2015 Strategic Plan Goal 1- Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3- Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Reduce pharmaceuticals in the environment.	Execute new services contract for the Colorado Medication Take-Back Program. Continue program operation and expand its reach.	October 2014 - FY 2015	<p>Signed services contract: New contract executed on 12/01/2014. Renewed for one year on 07/01/2015.</p> <p>Lbs./tons of medications collected: 11,867 pounds collected.</p> <p># of project inquiries: 197 public inquiries</p> <p># of locations added: No new locations added.</p> <p># and amount of donations received: \$300,000 legislative appropriation</p>

			became available for use on 07/01/2015
	Develop Take-Back Program policies and/or regulations to implement HB14-1207 that codified program in state statutes.	FY 2014 - FY 2015	Policy/regulations development: Proposed regulation development process launched in June 2015. First draft regulation under development as of 09/30/2015. Formal stakeholder process scheduled for FY2016. # of stakeholder meetings: Meetings to take place during FY2016.
	Assist with the problem identification and outreach efforts surrounding PIE.	Ongoing	# of stakeholders contacted: More than 180 individual stakeholders identified with interest in Medication Take-Back Program rules development. The County Sheriffs of Colorado and the Colorado Association of Chiefs of Police have worked to engage their members in the effort. # of projects initiated: The Medication Take-Back Program is the only on-going PIE project.
Reduce mercury in the environment.	Explore opportunities for mercury recycling programs (CFLs, thermometers, auto switch, etc.).	Ongoing	#of projects implemented and resulting environmental outcomes: No projects in FY2015

Develop processes and systems to address emerging contaminants.	Coordinate with appropriate health divisions to address health and environmental issues.	Ongoing	# of programs/projects implemented: One project implemented – Communicating public and environmental health impacts related to coal tar-based asphalt sealants. On-line FAQ's and letter to Local Public Health Agencies should be completed in FY2016. # of environmental outcomes: N/A
	Assess data to determine both the significance and scope of the problems affecting the well-being of Colorado's citizens.	Ongoing	Assessment completed and valid use of data: No data assessments in FY2015
	Identify environmental trends and respond with innovative ideas	Ongoing	No new trends identified
SUSTAINABILITY PROGRAM			
SARA PROGRAMS			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Effectively and efficiently implement the EPCRA/SARA Title III TRI and Tier II programs including all associated databases.	Receive and enter TRI (using the Exchange Network) and Tier II data from Colorado businesses (currently 9,000 facilities; 16,000 chemicals).	Ongoing	Timely and effective data entry: Process improvements allowed Tier II data to be processed and shared more quickly. Database was finalized on July 1 compared to the middle of September. All 2014 EPA TRI reports downloaded via CDX to TRI database. Completed database and web application update, installation of new node plug-in, and associated testing.
	Develop and maintain the TRI/Tier II database.	Ongoing	TRI database updated and tested and is searchable and maintained. RY2014 Tier II database generated and is searchable and maintained. Alternative Tier II database

			platforms are being investigated. New Colorado-specific requirements added for RY2015.
	Assess SARA fees, generate and mail bills, monitor payments and follow-up with unpaid accounts.	Ongoing	Timely assessment of fees and mailing of RY 2014 bills: O&G bills were sent out in August. Remaining bills were sent out in December. A Lean process was conducted for the SARA Program to increase efficiency of billing process.
	Utilize EPA internet based system for receipt of TRI reports.	Ongoing	Electronic system updated and new node plug-in installed. Tested and in use. 100% electronic submittals.
	Utilize EPA Tier2Submit software for electronic reporting of Tier II reports.	Ongoing	Electronic System in use; greater than 99% electronic submittals. Updated with state-specific requirements that will improve invoicing of SARA fees.
Provide information on program internally, and to public and facilities.	Respond to inquiries regarding Tier II and TRI reporting and payment requirements from Colorado businesses.	Ongoing	Response to inquiries provided in timely manner
	Respond to inquiries on information to the public and appropriate parties.	Ongoing	Coordinated responses with associated agencies to all information requests. Responded in a timely manner.
	Participate in CDPHE Health Equity/Environmental Justice (HEEJ) Data Team and provide SARA data sets for inclusion in HEEJ data analysis and tools	Ongoing	SARA datasets reviewed for HEEJ data tool use
	Generate chemical inventory reports for electronic transmittal to appropriate parties (LEPCs, CEPC, EPA, HMWMD Records Center, EMP).	Ongoing	Process improvements allowed Tier II data to be processed and shared with Colorado Emergency Planning Commission (CEPC) weekly as it was received. Master Tier II database was shared with CEPC and with LEPCs and reporting facilities upon request. Single-

			reporting of Tier II reports to the state implemented and facilitated.
SUSTAINABILITY PROGRAM			
GREENING GOVERNMENT			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 3-Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Administer Greening Government Program to reduce environmental impacts from state operations.	Participate as a lead state agency in implementing Greening Government programs and activities.	FY 2015	CDPHE Greening Government metrics are tracked annually and available for EPA review upon request.
	Attend and participate in regular meetings with other state agencies participating on the Greening Government Leadership Council.	FY 2015	Participation at meetings 15 meetings attended Executive Order drafted and signed by Gov. Hickenlooper on 10/28/15.
	Establish an internal greening government team to increase employee engagement.	Ongoing	4 staff representing 3 divisions participate in GG Leadership Council and workgroups
	Identify targets and objectives for annual Greening Government Projects.	FY 2015	Targets and Objectives have been set by new GG Executive Order.
	Implement projects to meet targets and objectives.	FY 2015	3 projects implemented including e-waste recycling event for employees, electric vehicle ride and drive and lunch and learn on Chasing Ice documentary.
	Provide assistance to other state agencies.	FY 2015	CDPHE participated in multiple GG workgroups to assist other state agencies.
	Report on projects and efforts.	FY 2015	Results of GG projects and metrics are included in New Employee Orientation. We are also working on new website.
Encourage, award, and educate the use of sustainability practices throughout Colorado.	Provide education and training to business, state and local government, and employees on sustainability practices.	Ongoing	Trainings are implemented through the Colorado Environmental Partnership and Environmental Leadership Program, see relevant sections below.
SUSTAINABILITY PROGRAM			

ENVIRONMENTAL LEADERSHIP PROGRAM			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality, Objective 1.3: Restore the Ozone Layer, Objective 1.4: Reduce Unnecessary Exposure to Radiation; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land, Objective 3.3: Restore Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Identify, recognize and provide incentives to businesses and municipalities that are going beyond compliance with environmental requirements and are developing sustainable business practices.	Grow the ELP while maintaining credibility of program and members.	Ongoing	16 member events held 790 members participated
Promote ELP to potential members through marketing and outreach.	Provide ELP outreach to companies, trade associations, etc. including a combination of at least 15 presentations, recruitment meetings and site visits with potential applicants annually.	Ongoing	16 presentations provided 274 attendees 17 recruitment meetings held
	Conduct seminars and/or provide training materials on EMS/ELP/P2/Sustainability to Colorado facilities.	Ongoing	2 presentations provided 48 attendees 40 entities reached
	Promote ELP programs internally and to local agencies for referrals.	Ongoing	8 referrals from state and local employees 300 contacts with state and local employees 5 new members as a result of internal referral
Provide member services and mentoring	Provide technical assistance and gap analysis for potential ELP members.	Ongoing	5 facilities provided assistance
	Provide EMS trainings, roundtables, workshops and other mentoring opportunities.	Ongoing	6 sessions 68 facilities attending
	Develop an annual ELP progress report.	Annually by December 31 ST	Completion and electronic distribution of report

Implement Gold Level ELP.	Expand membership in the Gold Level; enroll a minimum of 2 new participants annually.	Ongoing	12 new applicants 12 EMSs assessed 12 new members approved
	Expand the recognition elements of the program for the Gold Level annually, including: Contact each ELP member and document successes; place successes on website with members logos	Ongoing	Successes documented and measurements tracked
Implement Silver Level ELP.	Conduct mentoring training (EMS) for members.	Ongoing	3 Silver level members applying for Gold Level
	Continue to grow membership in Silver Level; enroll a minimum of 2 new participants in Silver Level annually.	Ongoing	15 new applicants 15 projects assessed 15 new members approved
Implement Bronze Level ELP.	Continue to grow membership in Bronze Level; enroll a minimum of 5 new participants in Bronze level annually.	Ongoing	34 new applicants 29 new members
Meet with External ELP Advisory Group.	Leverage through the PPAB and include other ELP members and other stakeholders.	Ongoing	2 recommendations provided and implemented
Meet with Internal ELP Advisory Group.	Meet with internal staff (as needed) to advise ELP on various elements of the program, including compliance reviews and issues.	Ongoing	6 recommendations provided and implemented
SUSTAINABILITY PROGRAM			
PARTNERSHIPS			
Supports EPA 2011-2015 Strategic Plan Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land, Objective 3.3: Restore Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Colorado Environmental Partnership (CEP)	Participate in selecting topics, finding speakers, promoting meetings, etc.	Ongoing	14 of collaborative events held
Collaborate with industry, not-for-profits, and governmental agencies in sustainability and energy education including entities such as:	Continue partnership with Colorado Energy Office, DOE and NREL on energy related projects.	Ongoing	4 projects or initiatives resulting from partnerships

<ul style="list-style-type: none"> -- Federal Govt: R8, NREL, DOE, OPPTS, Dept. of Commerce (Manufacturers Edge (formerly CAMT)). -- State & Local Partners: PPAB, DOA, Colorado Energy Office, Office of Economic Development, Sustainability Work Group, Manufacturers Edge (formerly CAMT). -- NGOs: Product Stewardship Institute, NPPR, Peaks-to-Prairies, Colorado Association for Recycling, Clean Cities and USGBC. -- Businesses & Assns: CLA, CMA, Colorado Auto Recyclers, Small Business Assn 	Serve as a board member or active participant in meetings and activities.	Ongoing	Participating in CU Denver's Managing for Sustainability Advisory Council. Attended 2 meetings.
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SUSTAINABILITY PROGRAM

POLLUTION PREVENTION PROGRAM

Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.1: Address Climate Change, Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention

Subgoals	Objectives	Timeline	Status and Accomplishments
Make pollution prevention the environmental management tool of first choice and include sustainability in department decision making.	Integrate pollution prevention concepts and techniques into Greening Government, Cross Media Compliance Assistance, and E3 initiatives to eliminate pollution at the source.	On-going	New P2 specialist hired in March 2015. Working to reinvigorate P2 program. Partnering with HMWMD and DEHS on efforts. More detailed information available in the P2 Final Grant Report.
Garner employee participation in environmental efforts.	Hold CDPHE-wide Cherry Creek Cleanups along the creek designated for CDPHE.	Spring and Fall 2015	Approximately 80 participants Approximately 750 lbs of trash collected
Participate in Colorado Economy, Energy, Environment (E3) Initiative with Manufacturers Edge (formerly CAMT), CEO and other partners.	Assist in recruitment of businesses/facilities, performing environmental/P2 portion of assessments, and follow-up to document implementation and environmental outcomes.	Ongoing	E3 initiative complete.

SUSTAINABILITY PROGRAM

POLLUTION PREVENTION ADVISORY BOARD

Supports EPA 2011-2015 Strategic Plan Goal 3-Objective 3.2: Preserve Land; Goal 4-Objective 4.2: Promote Pollution Prevention

Subgoals	Objectives	Timeline	Status and Accomplishments
Assist the Pollution Prevention Advisory Board (PPAB) in providing the maximum environmental benefit to CDPHE and other stakeholders.	Provide meeting support, as well as support for subcommittee meetings.	Ongoing	Provided agenda, meeting logistics, minutes, and other documentation in a timely manner.

Administer the P2 Grants Program from the P2 Fund.	Assist and support PPAB in grant review and selection process.	FY 2014/2015	7 new projects awarded for a total of \$62,340.
	Provide technical assistance to grantees. Track project progress and outcomes.	FY 2014/2015	Environmental benefits of completed P2 grants and tracked and available upon request.
Assist and support PPAB and the Assistance Committee in implementation of the Recycling Resources Economic Opportunity Grant Program.	Assist in the development of criteria for grants. Announcement of grant solicitation. Assist in the application evaluations.	Fall 2014 January 2015 Spring 2015	Criteria developed Grants announced and 11 projects awarded for a total of ~\$1.9 million
	Support grant recipients and track project performance, make project results available to the public.	Ongoing	11 Projects completed in a timely manner Final Project Reports are available to public within 30 days of completion of each project Environmental benefits and jobs created are tracked by the program and available upon request.
RREO Rebate Program	Assist in the development of criteria for rebates and announce rebate solicitation.	FY 2015	Criteria developed and rebate application posted. 74 applications approved for a total of \$300,000
SUSTAINABILITY PROGRAM			
SELF AUDIT LAW			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention; Goal 5, Objective 5.1: Enforce Environmental Laws			
Subgoals	Objectives	Timeline	Status and Accomplishments
Maintain the Self-Audit Policy and partner with EPA.	Abide by the Memorandum of Agreement and the EPA Self-Audit Policy.	On-going	14 entities submitting Self-Audit Requests
Maintain internal contacts with each CDPHE division.	Coordinate Self-Audit submittals to appropriate divisions	On-going	14 Closed Self-Audit requests (closed this year from previous years) 11 Open Self-Audit requests
Continue to expand, enhance and update the Self-Audit website.	Provide access to information as appropriate	On-going	Website maintained.
SUSTAINABILITY PROGRAMS			
SMALL BUSINESS OMBUDSMAN			

Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Represent Colorado at the national and regional level as CDPHE's Small Business Ombudsman.	Serve on the national 507 Steering Committee or SBO/SBAP Subcommittees, including conference calls, and materials related to Colorado's program.	Sept. 30, 2015	Participated on 3 National Steering Committee work groups; 1) annual training development, 2) technical review and 3) Promotional Activities completed include: Attended monthly conf calls, planned and facilitated session at May 2015 Annual Training in Raleigh, NC and attended other coordinated AWMA sessions, assisted in developing comment letters to EPA on a few new regulations.
Provide and track assistance provided to small business.	Refer small businesses to technical resource in the Small Business Assistance Program (SBAP). Send small businesses customer assistance rating surveys to gauge SBAP services.	Sept. 30, 2015	All technical requests are referred to SBAP. When callers are looking for guidance documents, SBO assists directly. 161 surveys were emailed to assisted small businesses A positive trend in survey results was seen with almost 100% of surveys reported good to excellent service.
	Provide timely response to small businesses.	Ongoing	# of entities assisted with timely response: 95-100 % within 24 hours
Serve as a resource for small businesses.	Serve as an impartial resource for small businesses that have complaints or concerns about fair treatment by the environmental divisions.	Ongoing	No compliance meetings resulted in a request for SBO assistance. 1 inquiry was made to EPA SBO. Contacts made with environmental divisions included staff from: Haz Waste, Radiation, Solid Waste, APCD and WQCD, P2, ELP and Recycling programs. All were contacted to assure information was

			consistent with requirements. Environmental outcomes of assistance efforts include a better understanding of compliance requirements as reported in survey evaluations by small businesses.
	Review SBAP guidance documents prior to issuance and provide advisory opinions.	Ongoing	Reviewed documents include: Boiler guidance documents, dry cleaning compliance calendar, emission calculators for various sectors, fact sheets and other outreach materials.
	Provide training and outreach on tools available for small businesses and the assistance available through SBAP.	Ongoing	Participated in the Dry Cleaner Alternatives Trade Fair
Review regulations to determine impact on small business and provide information on the regulations to small business community.	Ensure new and modified regulations that impact small businesses are reviewed. Solicit comments from the small business community and through Compliance Advisory Panel (CAP) and submit to EPA.	Ongoing	2 new regulations reviewed
Support and coordinate the Small Business Compliance Advisory Panel.	Assist in ensuring the Compliance Advisory Panel is an effective resource for small businesses and CDPHE, including assisting the CAP in issuing the annual report and discuss with EPA. Ensure audit of CAP is completed in timely manner	Ongoing	4 CAP meetings held. 4 presentations provided to the CAP, including guidance documents, projects and issues for its advisory opinions. Responded to all requests from DORA Representative. A legislative audit completed and several changes to program were implemented, including longer CAP terms.
SUSTAINABILITY PROGRAM			
ENVIRONMENTAL JUSTICE			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health, Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land, Objective 3.3: Restore Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Serve as the Division of Environmental Health and Sustainability's representative on	Participate in meetings between DEHS, EPA, and other CDPHE staff and	Sept. 30, 2015	Events participated in, facilitated and/or coordinated:

<p>environmental justice (EJ) issues.</p>	<p>communities, as appropriate.</p> <p>Raise awareness within the DEHS and other CDPHE programs on Health Equity (HE) and EJ issues that affect daily work duties and responsibilities</p> <p>Provide training to DEHS staff of emerging EJ issues as appropriate.</p> <p>Review EJ-related documents/policies and, as necessary, collaborate with DEHS staff on EJ projects or efforts, including obtaining information from EPA website, community newsletters, contacts and provide in meetings or correspondences as necessary.</p>	<ol style="list-style-type: none"> 1) Western States EJ phone calls. Presented in September on CDPHE incorporation of HE/EJ into Regulatory Programs. 2) Met with EPA Region 8 staff to discuss CDPHE progress. 3) Provided outreach on multiple opportunities to attend EJSCREEN webinars 4) Participated on ECOS calls to refine outreach on EJSCREEN <p>CDPHE HE/EJ meetings attended: Co-lead for Policy workgroup, assisted with the development of reg guidance and 3 training sessions to staff on incorporating HE/EJ into regulations.</p> <p>Events with EPA attended (e.g., Denver EJ Forum, EPA EJ training, etc.) Participate on Steering Committee for Denver Environmental Equity Forum. Two community meetings were held in February and September with ~20-25 in attendance.</p> <p>Training/Outreach: CDPHE has offered multiple HE/EJ related trainings, webinars and other educational opportunities.</p> <p>Documents/policies reviewed through a HE/EJ lens: Internal policy review procedure established, committee conducted several reviews and made recommendations to Senior Mgt Team prior to final approval. Reg Policy revised to incorporate HE/EJ review, Comprehensive policy</p>
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			drafted for department
Participate in the CDPHE Health Equities/Environmental Justice (HE/EJ) Collaborative.	Actively participate in identifying and helping to implement CDPHE's path forward regarding HE and EJ issues.	June 30, 2015	Two staff members from the Sustainability Program attended 12 Steering Committee monthly meetings.
ENVIRONMENTAL AGRICULTURE PROGRAM			
ANIMAL FEEDING OPERATION (CAFO, HCSFOS, AFO) PROGRAMS			
Supports EPA 2011-2015 Strategic Plan Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 5, Objective 5.1: Enforce Environmental Laws			
Subgoals	Objectives	Timeline	Status and Accomplishments
CAFO REGULATIONS Implement state- water quality regulatory programs specific to animal feeding operations (AFOs), concentrated animal feeding operations (CAFOs) and housed commercial swine feeding operations (HCSFOs) as appropriate.	Improve sector compliance through the development of effective water quality protection regulations that are in compliance with federal and state statutes and rules.	As necessary, update and implement state CAFO regulations to address CAFOs that are impacting water quality, or to reflect changes made to the federal CAFO rule.	Revise applicable state CAFO regulations within one year of the effective date of applicable federal rules. 100% consensus with all stakeholders on proposed regulatory revisions prior to the final state rulemaking hearing before the Colorado Water Quality Control Commission. Written comment only rulemaking to address deficiency identified in HCSFO Regulation, section 61.13, completed on 12/8/2014.
CAFO PERMITS <u>Permit</u> all <u>CAFOs</u> in accordance with applicable federal and state regulatory requirements and deadlines. <u>Reporting of permitted CAFO data</u> to EPA.	<ul style="list-style-type: none"> • Certify permitted CAFOs under Colorado CAFO general permit no. COA 932000. • Permit any new discharging CAFOs in accordance with applicable federal and state regulations. • Enter all data requirements on permitted CAFOs into ICIS, including the required elements of the approved Nutrient 	On-going Within 180 days of receipt of complete application. Mid Yr by April 30 EOY by Oct. 31 Quarterly, as	# of permitted CAFOs recertified under COA 932000. 1 # of new CAFOs certified under permit COA 932000. 6 % of permitted CAFOs entered into ICIS. 100%

	<p>Management Plan.</p> <ul style="list-style-type: none"> • Participate as appropriate in quarterly meetings with EPA to discuss progress towards meeting annual permitting and enforcement commitments. 	scheduled	
<p>CAFO INSPECTIONS</p> <p><u>Conduct CAFO inspections</u> to determine compliance with applicable federal and state regulatory and/or permit requirements.</p> <p><u>Report CAFO inspection information</u> to EPA.</p> <p><u>Submit CAFO Inspection Plan</u> to EPA.</p>	<ul style="list-style-type: none"> • Inspect all permitted CAFOs at least once during the life of the permit, every unpermitted CAFO at least once every five years, and all medium AFOs at least once to determine if it is a medium CAFO. • Complete a minimum of 40 CAFO compliance inspections by the end of each inspection year (i.e., Sept. 30th) in accordance with Colorado's Inspection Plan. • Participate in up to four joint/oversight EPA/State CAFO inspections, in addition to any other oversight inspections that may be conducted. (EPA will contact the Ag Program to schedule joint/oversight inspections at facilities identified in the CAFO inspection plan. • Provide electronic copies of all inspection reports and dated cover letters conducted per the state's inspection plan to EPA at the time the inspection is sent to the facility. This shall include inspections that are substituting for a planned inspection. • Enter all permitted CAFO inspections into ICIS. • Submit to EPA draft CAFO inspection 	<p>Ongoing over rolling five year periods.</p> <p>Sept. 30, 2015</p> <p>w/i 45 days of the inspection</p> <p>Mid Yr by April 30 EOY by Oct. 31</p> <p>Initial draft plan Aug. 1, 2014</p> <p>Final draft plan Sept. 1, 2014</p> <p>Sept. 30, 2014</p>	<p>% of known CAFO universe inspected every five years (at a minimum). 100%</p> <p># of CAFOs inspected. 50</p> <p># of medium AFOs inspected. 0</p> <p>% of return to compliance actions completed within established compliance deadline included in the follow up inspection report. 82%</p> <p># and type of [joint/oversight] inspections completed. Two joint inspections with EPA</p> <p>% of reports submitted to EPA within established timeline. 100%</p> <p>% of permitted CAFO inspections entered into ICIS by established timeline. 100%</p> <p>Submission of draft and final CAFO inspection plans by established timelines. Final plan emailed to EPA on 9/23/2014. No comments received.</p>

	<p>activities.</p> <ul style="list-style-type: none"> • Submit an electronic copy of the CAFO inventory to EPA and report on progress made toward inventory development. • Report to EPA on compliance assistance activities, training and presentations provided to the livestock industry. 		<p>group.</p> <p>EOY report and CAFO inventory submitted to EPA by the established timeline. CAFO Inventory sent to Michael Boeglin on 12/18/2015.</p>
CROSS-CUTTING ENVIRONMENTAL AGRICULTURE INITIATIVES			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems; Goal 4- Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Coordinate the Agricultural Technical Workgroup.	Review technical environmental data and potential new environmental requirements resulting from agricultural activities to gauge resource needs and potential new priorities.	Ongoing	<p>Participated in two NRCS State Technical meetings, coordinated multiple support meetings to review conservation practices to establish priority ranking criteria for Air Quality Initiative for EQIP.</p> <p>All workgroup recommendations were incorporated into ranking of practices to reduce ammonia emissions.</p>
Coordinate the Rocky Mountain National Park (RMNP) Agricultural Subcommittee.	Coordinate meetings of the subcommittee and interested stakeholders.	Ongoing	4 subcommittee meetings held
	Develop incentives to promote implementation of ammonia reduction best management practices (BMPs).	Ongoing	Incentives discussed or recommended include: Water quality database, the use of zeolite and biochar, and the Early Warning System to alert producers or impending upslope events.
	Develop outreach materials to educate agricultural producers and citizens on agriculture's contribution to nitrogen deposition in RMNP.	Sept. 2015	<p>3 fact sheets were developed and distributed.</p> <p>Plan for at least two Ag Outreach seminars in 2015: Presentations were made at multiple events, including the NRCS Ag Air Quality</p>

			Task Force, CO Farm Show, Rocky Mtn Agribusiness Assn, CO Livestock Assn annual meeting, etc.
	Work with CSU to field test ammonia BMPs at dairies and feedlots.	Ongoing	# of BMPs field-tested – N/A
	Work with USDA Natural Resources Conservation Service to promote ammonia reduction BMPs.	Sept. 30, 2015	A multitude of BMPs were promoted to ag producers. Primarily for this effort, the BMPs are discussed on the EWS web page and through the RMNP Initiative and CSU web pages. In addition, there were 3 fact sheets developed for Composters, Biosolids applicators and Agricultural Operations (Livestock and Crops).
	Work with the Air Pollution Control Division to improve Colorado's Ammonia Inventory.	Ongoing	% change in 2002 ammonia data (source contribution) across all sources – N/A
	Seek resources (grants) to support BMP research, outreach, monitoring, etc.	Ongoing	Several EPA, NRCS, PPAB and P2 funding sources were available for this project this year Ammonia-related outcomes of projects are not immediately available and still under evaluation.
	Participate in contingency plan measures, if applicable.	Sept. 30, 2015	N/A - Contingency Plan has not been triggered.
Serve as lead on NRCS Air Quality Committee	Work to implement recommendations from the crop and livestock sectors into NRCS conservation programs, including air and water quality conservation practices.	Sept. 30, 2015	See reporting for Ag Technical Workgroup above.
Increase compliance assistance to agriculture sector.	Provide outreach and interpretation to livestock producers on applicable solid waste and industrial waste water requirements.	Ongoing	# of producers seeking assistance on cross-cutting issues (i.e., composting and biofuels, etc.) Not tracked

	Coordinate communication within environmental divisions on issues impacting agriculture such as biofuel technologies, land application of sludges, composting, etc.	Ongoing	# of multi-media meetings held: No requests # of cross-cutting issues resolved : N/A
	Assist with permitting issues and questions from the agriculture industry on cross-cutting technologies.	Ongoing	Producers assisted are tracked by Env Ag Program. No requests.
ENVIRONMENTAL HEALTH			
COMPLIANCE ASSISTANCE			
Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention			
Subgoals	Objectives	Timeline	Status and Accomplishments
Provide regulatory oversight to schools under the jurisdiction of the department.	Conduct field inspections of schools under the jurisdiction of the department.	Ongoing	Percentage of schools with chemical laboratories assessed at least once during the performance period. 100% of schools with chemical laboratories were assessed at least once during the performance period through field inspection.
Increase regulatory effectiveness of local public health agencies inspecting schools.	Develop a self-certification program based on new school regulation as a compliance assessment tool for schools throughout the state.	FY 2015	Having a self-certification ready to launch by end of the performance period. After adoption of the revised Rules and Regulations Governing Schools in the State of Colorado, resources were shifted to the development of guidance for implementation of the regulation. Therefore, the development of the self-certification has been put on hold in order to reflect changes made to the regulation.
ENVIRONMENTAL HEALTH			
REGULATORY UNIFORMITY			

Supports EPA 2011-2015 Strategic Plan Goal 1-Objective 1.2: Improve Air Quality; Goal 2-Objective 2.1: Protect Human Health; Goal 3-Objective 3.1: Promote Sustainable and Livable Communities, Objective 3.2: Preserve Land; Goal 4-Objective 4.1: Ensure Chemical Safety, Objective 4.2: Promote Pollution Prevention

Subgoals	Objectives	Timeline	Status and Accomplishments
Assure updated regulatory foundation for schools.	Complete comprehensive revision of school regulations through statewide stakeholder process.	FY 2015	<p>Host a series of regional stakeholder meetings to gain consensus and achieve board adoption by end of the performance period.</p> <p>The Division participated in seven meetings with stakeholders. These included two formative discussions with representatives from the Colorado School District Environmental Professionals (COSDEP) and the Colorado Chemistry Teachers Association (CCTA), and five formal stakeholder meetings held on October 3, October 24, November 21, December 12, 2014 and January 9, 2015. Stakeholder meetings resulted in consensus on the proposed revisions. The Board of Health adopted the revised regulations on April 14, 2015.</p>
Provide training and assistance to state and local public health personnel and schools to assure uniformity in the application of the new school regulation.	Develop an on-line training course for newly adopted school regulation for regulatory personnel and schools.	FY 2015	<p>Development of on-line training course for local public health agencies and schools.</p> <p>An on-line training course for the newly adopted school regulation for regulatory personnel and schools was developed and made available statewide and is currently being used by school stakeholders.</p>

3.0 Air Pollution Control Division – FY2015 Work Plan Status and Accomplishments

APCD Goal 1: Achieve a level of air quality that protects and preserves human health

Sub-goals include:

- Attain and maintain National Ambient Air Quality Standards
- Protect citizens from exposures to toxic air pollutants

EPA 2014-2018 Strategic Plan:

- **Goal 1: Addressing Climate Change and Improving Air Quality**
- **Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution (Reduce Children's Blood Lead Levels)**
- **Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance**

Program Strategy	Activity	Milestone/Measure	End of Year Status
MOBILE SOURCE PROGRAMS			
1.1 Operate Automobile Inspection and Readjustment (A.I.R.) Program and Clean Screen Program – Regulation No. 11	Operate A.I.R. program in Denver metro and North Front Range areas.	Ongoing	A.I.R. Program inspected over 900,000 vehicles during this past year. Over 250,000 vehicles were identified as being clean screen eligible using remote sensing. More than 200,000 vehicles completed the clean screen process. More information on the A.I.R. Program may be obtained through the annual IM report.
	Construct and implement new IM Program in Denver metro and North Front Range areas.	Implement new program in 2015	New IM Program is operational. Will be entering its second year of operation shortly.
	Ensure that the A.I.R. program in Denver metro and North Front Range areas is consistent with and continues to meet all SIP requirements. North Front Range program is state-only, and not part of the SIP.	Ongoing	Program met all SIP requirements. North Front Range Area not included in SIP.

Program Strategy	Activity	Milestone/Measure	End of Year Status
	Inspector training/certification maintained.	Ongoing	Mobile Sources Program continues to emphasize inspector training. Inspector certifications have been maintained.
	Data collection and processing systems maintained.	Ongoing	On an ongoing basis, data collection and processing system have been maintained. Data for the IM Program can be seen in the appendices of the annual IM report.
	Support field enforcement activities by Dept. of Revenue.	Ongoing	Mobile Sources has supported Department of Revenue enforcement activities this past fiscal year. More detail may be obtained through the annual Inspection/Maintenance Program report.
	Monitor program quality and performance.	Ongoing. Annual report developed each year.	Annual A.I.R. Program report developed and released to public last summer.
	Provide support to customers, inspectors, auto entities and repair technicians, especially in light of new IM Program starting in 2015.	Ongoing	Staff responded to customer, repair technician, and automotive industry inquiries on an on-going basis. Various outreach programs such as "Tech nights" for the repair industry were conducted. In association with CDPHE, the state's contractor maintains outreach programs that include public service radio ads. Further information is located on their and CDPHE's websites.
1.2 Operate Diesel Inspection and Self-certification Program – Regulation No. 12 (State only)	Similar operation and training measures as A.I.R. Program. Continue to work with our counterparts at the regional and local levels to promote the Colorado Clean Diesel Program. Implement best practices as part of the Colorado Diesel Self-Certification Program.	Ongoing	Operation of the Diesel Opacity Inspection and Fleet Self-Certification programs has been ongoing. Emphasis has been placed on best practices for large Self-Cert fleets.

Program Strategy	Activity	Milestone/Measure	End of Year Status
1.3 Develop and participate in mobile source air quality improvement strategies	Continue remote sensing activities.	Ongoing	Over 250,000 vehicles were identified as being clean screen eligible through the use of on-road remote sensing. More than 200,000 vehicles completed the clean screen process. The proportion of the fleet observed through remote sensing meets SIP requirements Laser based (HEAT) remote sensing technology examined. Looking at in-use vehicle emissions trends using remote sensing. Remote sensing data from diesel vehicles used in the assessment of NOx emissions from light duty Volkswagon diesel vehicles.
	Implement and continue smoking vehicle programs.	Ongoing	Smoking vehicle hotline continues to be maintained. Tech center assistance available for motorists with problem vehicles.
	Participate in Regional Air Quality Council programs.	Ongoing	Assisting RAQC with mobile source issues, including fuels, in the development of the new ozone SIP
	Review auditor A.I.R. Program recommendations.	Ongoing. Expanding model year exceptions to seven model years and incorporating On-Board-Diagnostic (OBD) as a component of the new IM Program starting in 2015.	Have expended model year exemptions to seven years and incorporated OBD into the new IM program.
	Conduct public outreach, with emphasis on the new forthcoming IM program.	Ongoing	MSP continues to conduct public outreach with its Tech Centers and website, along with activities such as Tech Nights. State's contractor, in cooperation with CDPHE, maintains outreach programs that include public service radio ads, with further information located on their and the CDPHE's websites.
	Contribute area-wide assessment of RVP	Ongoing	Staff reported on winter and summer

Program Strategy	Activity	Milestone/Measure	End of Year Status
	levels, and other gasoline parameters, as part of Ozone SIP development.		gasoline fuel assessments. 309 samples collected and analyzed this summer, with 123 samples collected and analyzed this past winter. Measurements on fuel volatility, percent ethanol and sulfur content were conducted.
	Utilize MOVES model in SIP planning and mobile source air quality assessment activities. Continue participation in model improvement and development activities.	Ongoing	Transition to latest version of MOVES completed. Transition includes updating the nonattainment area fleet characterization inputs. Assisting RAQC with the new ozone SIP development
	Monitor Federal Renewable Fuels Program.	Ongoing	Following latest developments including continuing proposals to lower ethanol requirements.
	Monitor federal new Tier 3 vehicle emissions certification, GHG, and CAFÉ rules. Continue to contrast federal rules to California's LEV program.	Ongoing	Tracking EPA and CARB rules that generally harmonize future emissions, fuel economy and GHG emission standards.
	Examine the use of remote sensing to identify vehicles with high evaporative emissions.	Conducting research.	Remote sensing based on study results may show promise in identifying vehicles with high evaporative emissions in certain cases.
	Continue OBD effectiveness study.	Conducting research.	On-going
	Conduct vehicle OBD deterioration study. Study examines vehicle emissions deterioration in OBD equipped vehicles.	Conducting research.	One of the main research projects this year for the emissions laboratory.
1.4 Support mobile source strategies through technical studies and operation of testing equipment and facilities	Provide mobile source emission inventories and emission factors.	Ongoing	Emission inventories and emission factors being used in development of new mobile source inventories.
	Operate and maintain Technical Centers.	Ongoing	Tech centers continue to assist motorists with free vehicle inspections. Advice to motorists and the repair industry is on-going.
	Operate and maintain mass emissions testing facility.	Ongoing	In the middle of several on-going research projects, including vehicle deterioration study, control strategies

Program Strategy	Activity	Milestone/Measure	End of Year Status
			evaluation, and real-world, in-use emissions analyzes. Laboratory scheduled for an extensive upgrade in the coming year.
	Conduct an analysis of Colorado fuel market including: volatility, ethanol content, market status and other parameters	Ongoing	Analysis of Colorado fuel market completed. Generally good compliance with regulatory standards. Fuel property analysis completed. Summer fuel volatility averaged 8.7 psia RVP this summer, with last winter's averaging 13.1 psi RVP. All samples contained ethanol at approximately 10% level for both seasons.
	Contribute to division inventory report of actual annual emission data.	Ongoing	On-going
STATIONARY SOURCE PROGRAMS			
1.5 Conduct activities of the Construction Permits Program for stationary sources	Issue permits to minor sources in Colorado.	Number of minor source permits issued	2,541 minor source permits issued.
	Issue synthetic minor permits to applicable sources in Colorado.	Number of synthetic minor permits issued	239 synthetic minor source permits issued.
	Issue PSD permits.	Number of PSD permits issued	No PSD permits were issued.
	Issue permits to major sources in nonattainment areas.	Number of NAA NSR permits issued	No NAA NSR permits were issued.
	Enter RACT/BACT/LAER determinations in EPA's clearinghouse database (RBLC) within 30 days following permit issuance, including the "application acceptance date" and "date of permit issuance."	Data entered on a continuing basis	RBLC entries were made on an ongoing basis.
	Prepare AIRS data entry and forward to Inventory Group.	Ongoing	AIRS data prepared and forwarded to Inventory Group on an ongoing basis.
	Track PSD increment periodically to meet the requirement of 40 CFR 51.166(a)(4).	Ongoing	PSD increment periodically tracked on an ongoing basis.
1.6 Conduct activities of the Operating Permits Program for stationary sources	Ensure sources submit Title V applications for renewal.	Monitored throughout the year.	Ensured that subject sources submitted Title V applications. Worked with these subject sources through both the permitting and field inspection programs.

Program Strategy	Activity	Milestone/Measure	End of Year Status
	Prepare AIRS data entry and forward to Inventory Group.	Ongoing	AIRS data prepared and forwarded to Inventory Group on an ongoing basis.
	Continue development of program with EPA guidance (Part 70) and input from affected parties.	Ongoing	Program development continues on an ongoing basis consistent with EPA guidance and informed by input from affected parties.
	Continue to issue proposed, initial, renewal, and modified Title V permits.	Ongoing	Issued proposed, initial, renewal, and modified Title V permits.
	Prepare and submit TOPS data to the Region for entry into EPA's national database.	Ongoing	Prepared and submitted TOPS data to EPA Region 8 for entry into national database.
	Address recordkeeping and information request requirements.	Ongoing	Recordkeeping requirements addressed through Title V permits and information requests are responded to on an ongoing basis.
	Coordinate with EPA on petitions for Title V permits.	Ongoing	Coordinated with EPA on Title V permit petitions for Colorado sources and responded to EPA orders as appropriate.
1.7 Operate Small Business Assistance Program	Conduct industry workshops, data collection and coordination.	Ongoing	SBAP conducted 13 workshops, and 8 separate trainings.
	Support Compliance Advisory Panel	Ongoing	SBAP attends and supports quarterly CAP meetings.
	Update small businesses through site visits and technical assistance (MOU with Field Services Unit).	Site visits performed when requested by business, Field Services, or others.	SBAP conducted 20 on-site visits, and directly assisted 1064 businesses.
	Provide consultations and site visits in accordance with MOU with Field Services Unit on enforcement referrals.	Site visits performed when requested by business, Field Services, or others.	SBAP conducted 20 on-site visits, and directly assisted 1064 businesses.
	Outreach and coordination with local health departments.	Ongoing. Local health departments invited to workshops.	Local health departments are assisted upon request, and invited to workshops and trainings as appropriate.
	Participate in Cross Media Innovation and Strategy Team – sector projects and coordination.	Ongoing	SBAP attends CMIST meetings, and directly participated in the team's coal-tar sealant project.
	Develop End-of-year report on compliance assistance efforts	Ongoing – Report developed annually	Report completed and submitted to EPA on time.

Program Strategy	Activity	Milestone/Measure	End of Year Status
Stationary Sources Program Enforcement:			
1.8 Develop regulations and strategies to support compliance with regulations	Continue to evaluate methods to incorporate P2 into regulations and permits.	Ongoing	P2 is considered during control strategy development efforts and permitting regulation development and review.
	Provide support and training to engineers and inspectors (policy interpretation, settlement documents, assist in negotiation of settlements, enforcement data base).	Ongoing	Support and training provided as needed.
	Revise NSR and PSD regulations as needed.	Ongoing	NSR and PSD regulations are revised pursuant to federal requirements.
	Revise Reg. 6 – New Source Performance Standards.	Annual - Ongoing	Federal NSPS were reviewed. Revisions and new rules were adopted into Regulation 6 as necessary.
	Revise Reg. No. 8 Parts A & E incorporating MACT and NESHAP rulemaking updates and development of cooperative federal/state work plan. To include: funding options; addressing 112(j) compliance deadlines; development and implementation of area source rules; development of information; incorporation of pollution prevention where appropriate; and analyses regarding air toxics.	Annual - Ongoing	Federal MACT and NESHAP were reviewed. Revisions and new rules were adopted into Regulation 8 as necessary.
	Revise Common Provisions, Regulation 1, Regulation 3, Regulation 4, Regulation 7 regulations to maintain an updated SIP or in respond to EPA SIP disapproval actions.	Ongoing	Common Provisions, Regulation 1, 3, 4, and 7 are revised as necessary.
1.9 Continue oversight of local health department contracts and inspections (Field Services)	Negotiate contracts annually.	Compliance & Enforcement Program local agency contracts follow the state fiscal year (July 1 through June 30).	Contacts for state fiscal year '15-'16 were in place prior to July 1, 2015.
1.10 Conduct compliance inspections and evaluations for industrial sources (major and minor) and final	Inspection review, assistance as needed, enter reports on ICIS-AIR, maintain tracking logs, monitor quarterly reports.	Field Services activities ongoing; reports are reviewed and entered into ICIS-AIR as they are received, assistance is provided to local agencies as needed and upon request, monthly and quarterly reports are maintained to	Ongoing

Program Strategy	Activity	Milestone/Measure	End of Year Status
approval inspections. Report information to EPA through the ICIS-Air database.		track local agency activity per contracts	
	Ensure proper certifications (odor & opacity) in place for local agency staff.	Contracts require agency staff attend and obtain opacity and odor certifications. Division does periodic spot checks of certification status.	Ongoing
	Operating and other final permits reviewed.	Ongoing	Ongoing
	Conduct final approval inspections for facilities.	Ongoing; Sources are required to submit a "self-certification" for compliance with initial approval permits; Division reviews all of the required documents before approving the permit for "final approval"	Ongoing
	Perform stack testing, source audits and CEM certifications.	Ongoing Number of stack tests (Approximately 600 tests conducted per year) Number of relative accuracy test audits (Approximately 75 RATAs conducted per year)	962 stack tests conducted in EPA FY'15 (on a pollutant-basis) 74 RATAs conducted in EPA FY'15
	Evaluate excess emission reports.	EERs are submitted on a quarterly basis and are reviewed in detail following submittal.	Ongoing
	Provide /ICIS-AIR updates as necessary through:	ICIS-AIR updated approximately once per month, including all of the MDRs on all sources; all CMS sources are flagged in ICIS-AIR and HPVs are correctly identified; Division conducts periodic reviews to ensure data is correct	Ongoing
	1. Provide timely data to ICIS-AIR as identified in the National Minimum Data Requirements (MDR's) on CMS sources evaluated or investigated, and on any other sources that are major according to CAA definition. 2. Coordinate with EPA to ensure that CMS sources are flagged in ICIS-Air for inspection, and to ensure that high priority violations are correctly identified in ICIS-AIR.	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measure	End of Year Status
	3. Perform periodic reviews of ICIS-AIR data to ensure required data have been entered correctly.		
	Submit Compliance Monitoring Strategy to EPA	Submitted to EPA by September 30 of each year for the EPA fiscal year beginning on October 1.	CMS Plan for FY'16 was submitted to EPA on 9/30/15
1.11 Conduct residential burning emissions control program	Participate in High Pollution Advisory Program in Denver metro area.	Ongoing. Daily air quality "Action Day" forecasts are issued from November 1 to March 31.	Participated in High Pollution Advisory Program in Denver metro area and issued forecasts on an ongoing basis.
	Respond to and follow up on complaints.	Complaints are investigated as they are received.	Complaints investigations are conducted on an ongoing basis
	Coordinate with WESTAR and EPA in identifying PM2.5 and HAP emission contributions from minor source wood boilers and identifying possible control measures if necessary.	Division participates in workshops, trainings and discussions regarding wood boilers.	Ongoing
	Issue warning letters, compliance advisories, NOVs and compliance orders. Conduct AQCC hearings and Settlement Agreements (both state and local agencies)	Ongoing	Ongoing
1.12 Conduct general open burning program	Issue open burning permits and coordinate enforcement against illegal burning and open burning bans.	Ongoing	Ongoing
1.13 Conduct testing and evaluation of industrial sources	Maintain emissions and facility data system from new, revised and renewed APENs into data system.	Ongoing	Emissions and facility data is updated on an ongoing basis as soon as APENs are received by the Inventory & Support team.
1.14 Operate stationary source emissions and facility data system	Utilize the Exchange Network to transfer the Emissions Inventory System information.	Ongoing	Emissions inventory is transferred on an annual basis using the Exchange Network.
	Participate in ongoing training provided on National Emission Inventory.	Ongoing	The Inventory & Support team participates in all webinars and training opportunities provided.
1.15 Monitor local SIP commitments – Reg. No. 16 street sanding	Monitoring and assessing community SIP sanding reduction activities and reports.	Ongoing	All street sanding reports are monitored and assessed by the Inventory & Support team as they are received.

Program Strategy	Activity	Milestone/Measure	End of Year Status
INDOOR ENVIRONMENT PROGRAM			
1.16 Reduce asbestos exposure to the public through operation of the Asbestos Program	Conduct 200 inspections for compliance with Regulation No. 8 and NESHAP.	Ongoing Number of inspections completed	There were 703 inspections conducted.
	Review notifications; issue abatement and demolition permits.	Ongoing Number of demolition permits issued Number of abatement permits issued	There were 2,364 demolition permits issued There were 5,380 asbestos abatement permits issued.
	Process certification applications; issue certifications.	Ongoing Number of certifications reviewed and processed for Workers, Supervisors, Building Inspectors, Management Planners, Project Designers, Air Monitoring Specialists and General Abatement Contractors. Number of registrations reviewed and processed for asbestos laboratories, training providers and asbestos consulting firms.	There were 2,908 certifications reviewed and processed. There were 276 registrations reviewed and processed.
	Initiate enforcement actions; timely and appropriate resolution of cases.	Ongoing Number of non-school cases opened Number of non-school cases closed Number of school cases opened Number of school cases closed	There were 20 non-school cases opened and 35 non-school cases closed. There were 39 school cases opened and 49 school cases closed.
	Conduct outreach activities.	Ongoing Number of outreach activities conducted	We conducted 5 formal outreach activities.
	Incorporate asbestos enforcement requirements in local health department contracts.	The Asbestos Unit currently has contracts with three local health departments to perform asbestos inspections.	We continue to have asbestos contracts with three local agencies: Denver; Jefferson and Weld.
	Conduct Rulemaking, as necessary.	The Asbestos Unit will not be undertaking a revision to Colorado Reg. No. 8 during the 2015 federal fiscal year.	As anticipated, we did not undertake a revision to Regulation No. 8, Part B (Asbestos).
	Enter data into a database for all asbestos	Data for all abatement, demolition,	Data for all abatement, demolition,

Program Strategy	Activity	Milestone/Measure	End of Year Status
	NESHAP notifications and enforcement actions.	certification and enforcement actions is entered into the database on an ongoing basis.	certification and enforcement actions continues to be entered into the database on an ongoing basis.
	Implement the TSCA Asbestos-in-Schools Program according to federal and state rules.	The Asbestos Unit continues to implement the TSCA Program, assisting schools to manage asbestos in their buildings. Activities include inspections, being available as a resource for school personnel and responding to complaints. All grant related reports were filed with EPA in a timely manner.	The Asbestos Unit continues to implement the TSCA Program, assisting schools with management of asbestos in their buildings. Activities include inspections, serving as a resource for school personnel and responding to complaints. All grant related reports were filed with EPA in a timely manner.
1.17 Reduce occurrences of asbestos in schools (CDPHE will implement activities as described in work plan narrative)	Conduct 48 TSCA/AHERA inspections.	Ongoing Number of inspections conducted Number of course audits conducted	We conducted 50 TSCA inspections and 11 course audits.
1.18 Operation of lead-based paint certification and abatement program.	Conduct 20 inspections for compliance with Regulation No. 19. Conduct 5 406(b) rule inspections.	Ongoing: Number of inspections conducted	There were 16 inspections conducted for compliance with Regulation No.19. Another 18 406(b) rule inspections were also conducted.
	Implement the 406(b) rule (Part B of Regulation No. 19). This enables us to ensure that renovation contractors provide lead-hazard information to building owners and residents.	Ongoing.	The Lead Unit continues to provide information to renovation contractors on the requirements of Part B of Regulation No. 19).
	Process Certification applications, issue certifications.	Ongoing: Number of certifications processed and issued.	There were 207 certifications reviewed, processed and issued.
	Conduct lead-based paint course audits	Ongoing: Number of audits conducted	There were 11lead-based paint course audits conducted.
	Initiate enforcement actions, timely and appropriate resolution of cases.	Ongoing: Number of actions initiated, Number of resolved	There were no lead-based paint enforcement actions initiated. There were several lead cases closed out, some of which needed to be sent to state collections.
	Distribute educational materials.	Ongoing	The Lead Unit has worked to distribute

Program Strategy	Activity	Milestone/Measure	End of Year Status
			materials designed to educate the public about the dangers associated with lead-based paint, including tote bags, pamphlets and other physical reminders as well as participating in a televised public service announcement event.
	Partner with local health departments. Partner with state and local housing agencies.	Ongoing	The Lead Unit continues to partner with other health and housing departments. The Unit continues to manage the Colorado Lead Coalition, which seeks to bring together these types of organizations to promote the goal of eliminating childhood lead poisoning in Colorado
	Conduct Rulemaking as necessary.	As needed	The Lead-based Paint Unit did not need to undertake any revisions to Regulation No. 19 during this fiscal year.
PLANNING AND POLICY – SIP DEVELOPMENT, REGIONAL COLLABORATION, EMERGING ISSUES, COMMUNITY RELATIONS AND COMMUNICATIONS			
1.19 Develop and implement community based air quality programs in cooperation with local agencies or local governments	Monitor community initiatives in San Luis Valley, Lamar (to support maintenance SIP), Grand Valley – Grand Junction area, and other regions of Colorado as warranted.	Ongoing,	Ongoing; Exceptional Event documentation submitted to EPA for Lamar area through April 2015.
	Coordinate Western Colorado Regional Air Quality Collaboration, a voluntary community partnership to promote consistency and collaboration regarding air quality issues.	Ongoing	Ongoing – calls/meetings every 6-8 weeks
	Provide assistance to Garfield County community-based initiative to address natural gas development concerns.	Ongoing	Ongoing – semiannual/annual meetings
	Work to Identify other at risk areas through monitoring or other methods.	Ongoing	Completed – annual assessment
	Respond to citizen concerns and inquiries regarding Colorado's air quality and air pollution control strategies	Ongoing	Ongoing as requested
1.20	Assist the Regional Air Quality Council in evaluating the effectiveness of the 2008	Ongoing - Implement voluntary ozone control measures if necessary to meet	Ongoing investigation contingent on model evaluation.

Program Strategy	Activity	Milestone/Measure	End of Year Status
Develop and/or revise maintenance SIPs and redesignation requests for current nonattainment and attainment/maintenance areas in Colorado	Ozone Action Plan in meeting the 2008 ozone NAAQS.	2008 ozone standard.	
	Develop/Prepare Regional Haze 5-year Progress Report SIP.	Submit SIP to Air Quality Control Commission for proposed adoption in fall 2015. RH SIP due to EPA on May 25, 2016.	Approved by AQCC November 19, 2015.
	Develop/Prepare 111(d) Plan	Submit Plan to Air Quality Control Commission for proposed adoption in fall 2015?	Initial Clean Power Plan under development for submittal to EPA in 2016.
1.21 Develop and submit recommended NAAQS designations, as needed	Follow federal NAAQS revision process and prepare recommended designations to submit to EPA as needed.	As needed.	2015 Ozone NAAQS designation recommendations now due to EPA on Oct. 1, 2016
	Develop/Prepare List of SO2 Sources required to take an Emission Limit or Model/Monitor air quality for future SO2 NAAQS designation	Submit to EPA by January 15, 2016.	List under development.
1.22 Develop and submit Infrastructure SIPs	Develop and submit 2012 PM2.5 NAAQS infrastructure SIP/certification.	Submit to EPA in late 2014.	Submitted December 1, 2015.
1.23 Develop and submit Interstate Transport SIPs	Prepare 2012 PM2.5 NAAQS Interstate Transport SIP	Submit SIP to Air Quality Control Commission for proposed adoption in 2015/16.	Utilizing Infrastructure SIP certification for interstate transport demonstration.
	Prepare 2010 NO2 NAAQS Interstate Transport SIP.	Submit SIP to Air Quality Control Commission for proposed adoption in 2014/15.	Infrastructure SIP certification submitted that shows no nonattainment or maintenance areas exist for interstate transport issues.
	Prepare 2010 SO2 NAAQS Interstate Transport SIP.	Submit SIP to Air Quality Control Commission for proposed adoption in 2014/15.	To be developed if necessary. Infrastructure SIP certification may suffice.
1.24 Monitor transportation conformity determinations of MPO and CDOT programs and projects – Regulation No. 10	Monitor conformity determinations for Metropolitan Planning Organizations (MPOs) along Front Range.	Ongoing	Ongoing
1.25 Support NEPA activities including review of air quality impacts disclosed in NEPA	Review and comment on documents/letters prepared for NEPA process such as Environmental Impact Statements and Resource Management Plans.	Ongoing	Ongoing; plan to quantify the number of NEPA processes APCD submits comments for in the future.

Program Strategy	Activity	Milestone/Measure	End of Year Status
documents			
1.26 Conduct Regional Modeling for ozone and other purposes	Continue review National Air Toxics Assessments data and comment on proposed rules and policy.	Ongoing	Ongoing
1.27 Operate General Air Toxics Program	Work with other Division programs to seek funding for additional monitoring and grant funding (such as DERA grants).	Ongoing	Ongoing
	Complete additional diesel school bus retrofits contingent upon receipt of DERA funds.	Ongoing	Ongoing
	Improve oil and gas related emission inventories with additional focus on diesel truck traffic.	Ongoing	Ongoing
	Continue implementation of mercury reduction initiatives within CDPHE and assist in development of Mercury TMDL. Analyze mercury reductions since implementation of 2007 Colorado Mercury Rule.	Ongoing	Ongoing – quarterly updates available.
1.28 Implement cross-media initiatives	Continue coordination with other CDPHE programs in development and implementation of: Cross Media Programs, and Environmental Coordinating Committee.	Ongoing	Ongoing
TECHNICAL SERVICES PROGRAM -- MONITORING, EMISSION INVENTORIES, MODELING, PRESCRIBED FIRE			
1.29 Monitor Air Quality	Per CFR Schedule, submit all ambient criteria pollutant data to the Air Quality System (AQS).	Ongoing	Ongoing
	Per the Exchange Network requirements for regulatory and national system reporting, submit XML-formatted AQS data.	NEIEN grant participation is ongoing.	NEIEN grant ended on 9/30/2015. Data are being submitted to AQS through the node.
	Implement ambient air monitoring program in accordance with 40 CFR Part 58.	Ongoing	Ongoing
	Submit five-year Network Assessment.	Submitted by July 1, 2015 deadline.	Completed. Report submitted to EPA on 7/1/2015.
	Submit annual SLAMS data certification.	Ongoing, due by May 1 each year.	Ongoing
	Operate and maintain monitoring sites statewide (gaseous, particulate, meteorology).	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measure	End of Year Status
	Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests.		
	Conduct required lead monitoring at Centennial Airport.	Ongoing Evaluation and discussion with EPA in 2014 to assess the need for continuation.	Completed. Monitoring ended on 12/31/2014, with EPA approval.
	Provide updates to department-wide Quality Assurance Management Plan (QMP) and submit to EPA as needed.	Completed in 2011. Full revision to be submitted to EPA in late 2014.	Ongoing. QMP is currently undergoing final department-wide revision reviews.
	Revise Quality Assurance Project Plan (QAPP) and submit to EPA.	Ongoing/revisions in progress, to be completed in late 2014 and submitted to EPA.	Ongoing. QAPP has been completely revised/updated and was submitted to EPA on 8/3/2015.
	Operate ambient air monitoring network in accordance with QAPP.	Ongoing	Ongoing
	Modify and update CDPHE data in EPA AQS System.	Ongoing	Ongoing
	Produce Annual Air Quality Data Report.	Ongoing	Ongoing. 2014 report is under review.
	QA / QC Review.	Ongoing	Ongoing
	Submit Annual Network Plan to EPA that is oriented toward the new National Air Monitoring Strategy guidance. Review site files.	Ongoing, due by July 1 each year.	Ongoing. 2015 Network Plan was submitted to EPA on 7/1/2015.
	Conduct daily forecasting, summer and winter pollution advisories, and prepare High Pollution Advisory Season and Summer Ozone Advisory Statistics.	Ongoing	Ongoing
	Continue Emergency Response Forecasting and Support to CDPHE Emergency Response Planning.	Ongoing	Ongoing
	Continue NCore monitoring station as approved by EPA.	Ongoing	Ongoing
	Maintain awareness of requirements for monitoring for new NAAQS. Install sites as	Ongoing. Second near-road NO2 site in Denver	Ongoing. Completed. Second near-road site

Program Strategy	Activity	Milestone/Measure	End of Year Status
	needed to meet requirements.	will be installed in 2014, to be operational by 1/1/2015. PM2.5 at near-road site by 1/1/2015.	became operational on 10/1/2015 to meet EPA consent letter requirements. Completed. PM2.5 installed in second near-road site and operational as of 10/1/2015.
	Maintain awareness of new requirements for Exceptional Events. Flag data in AQS related to natural and exceptional events. Develop and submit documentation to EPA.	Ongoing. Calendar year flags and initial event descriptions in AQS by July 1 of the following year. Development and submittal of exceptional event documents is ongoing.	Ongoing. Blowing dust events and ozone stratospheric/wildfire-related events have been flagged in AQS. Ongoing. Blowing dust events through April 2015 for Lamar have been submitted to EPA to support the Maintenance Plan 1-year update.
	Conduct Special Monitoring Projects.	As needed. Ozone precursor/NMOC sites ongoing in Denver/Weld county area. North Front Range Emissions and Dispersion Study commenced in 2013.	Ongoing.
	Continue National Air Toxics Trends monitoring site in Grand Junction: Maintain and repair VOC/carbonyl, PAH and PM10/metals monitoring equipment. Install and maintain additional equipment as required. Perform calibrations and audits on the equipment. Interpret and report data received from the analytical lab. Submit metals data to AQS within 90 days after the end of each quarter. Provide quarterly analysis updates. Perform monitoring according to the NATTS QAPP. Review and Update QAPP as necessary.	Ongoing. QAPP/SOP updates to be completed and submitted to EPA in late 2014.	Ongoing. The QAPP/SOP was completely revised/updated and submitted to EPA on 9/17/2015.
	Assist local agencies in special monitoring studies.	Ongoing. Work on a locally supported source air toxics study targeted at development activities in Garfield County is underway.	Ongoing. Collaboration with Garfield County on natural gas development continues.
1.30 Develop and Maintain Emissions Inventories	Provide updated emission inventory reports using new EIS system for point, nonpoint and mobile sources (type B) using 2015 emission data and based on the EPA-	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measure	End of Year Status
	established reporting thresholds for SOX, NOX, VOC, PM2.5 and PM10, CO, Pb and NH3.		
	Develop of an Integrated Approach / Methodology for Inventory Development.	Ongoing	Discontinued. This has been supplanted by work on the Three-State Data Warehouse.
	Support inventory development for state SIPs including Ozone SIP.	Ongoing	Ongoing. New 2017 inventory projections have been developed for the ozone SIP for the North Front Range area bump-up from marginal to moderate
	Continue work on the 3-state pilot program: monitoring, emissions/data warehouse (as identified in the "2010 Three-State Pilot Project: Air Monitoring Site Installation and Operation, Emissions Inventory Data Warehouse Development – Colorado Workplan and Budget"), and modeling (as funding is available).	Ongoing. Ozone/meteorological site near Maybell is operational. Site to be moved at end of 2014 to a new Dinosaur-East location. Development and implementation of the Data Warehouse is continuing.	Ongoing. Lay Peak (Maybell) site shut down on 12/31/2014. Elk Springs (Dinosaur East) site commenced operation on 8/1/2015. Location for new Paradox site has been determined. Data Warehouse development work continues.
1.31 Conduct Air Quality Modeling	Conduct modeling for stationary source permits.	Ongoing	Ongoing
	Conduct regional modeling for ozone and other purposes.	Ongoing	Ongoing
	Conduct modeling for state SIPs as needed.	Ongoing	Ongoing. Work on the ozone SIP for the North Front Range area bump-up from marginal to moderate is underway.
1.32 Conduct Prescribed Fire Program	Implement prescribed fire program (develop MOU and issue permits for significant users of prescribed fire through implementation of state-only program through Reg. No. 9: Open Burning, Prescribed Fire and Permitting.)	Ongoing	Ongoing. 351 Prescribed Fire permits issued from 10/1/2014 – 9/30/2015.
	Conduct oversight to ensure that permittees implement best air quality protection practices in prescribed burning events.	Ongoing	Ongoing
	Implement local delegation component of	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measure	End of Year Status
	program.		
	Continue evaluating and implementing recommendations from report developed by HB-09-1199 mandate to review and evaluate Smoke Management Program. Recommendations focus on improved and simplified permitting, communications, monitoring and observation of fires and smoke, resource identification and data analysis.	Ongoing Work is continuing on relaxing standard conditions, as appropriate. Work towards pilot burns statewide is underway.	Ongoing Standard conditions revised/relaxed effective 8/1/2015 to allow for increased burning. Tunnel Hill pilot project is continuing through 2015.

APCD Goal 2: Achieve levels of air quality in Colorado that protect the integrity of the natural ecosystem

APCD Sub-goals include:

- Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.
- Protect stratospheric ozone – Ensure the control of CFC compounds.
- Take action on climate change – Ensure greenhouse gas emissions are managed.
- Protect environment from Mercury contamination.

EPA 2014-2018 Strategic Plan

- **Goal 1: Addressing Climate Change and Improving Air Quality:**
 - **Objective 1.1 Address Climate Change**
 - **Objective 1.2 Improve Air Quality**
 - **Objective 1.3 Restore and Protect the Ozone Layer**

Program Strategy	Activity	Milestone/Measures	End of Year Status
2.1 Ensure acid rain minimized through operation of construction and operating permit programs	Issue permits to utilities.	Ongoing	Construction and operating permits issued to subject utilities consistent with the requirements of the acid rain program.
2.2 Ensure acid deposition emissions are minimized through testing and evaluation of industrial sources	Conduct stack testing, source audits and CEM certifications for utilities.	Ongoing	Ongoing; see update under 1.10
	Evaluate excess emission reports for utilities	Ongoing	Ongoing; see update under 1.10
2.3 Ensure acid rain minimized though updates to Regulation No.18 as necessary	Revise regulation.	Ongoing	Ongoing

Program Strategy	Activity	Milestone/Measures	End of Year Status
2.4 Reduce nitrogen deposition through implementation of Rocky Mountain National Park Initiative	Annually assess monitoring/research data.	Ongoing	Completed through 2014.
	Work with agricultural stakeholders to develop studies, projects, and Best Management Practices to reduce ammonia emissions	Ongoing	Ongoing; Early Warning System pilot shows promise.
	Develop improved ammonia inventory.	Ongoing	Ongoing – focus on unknown source category contributions to determine significance.
	Focus additional attention to RMNP in regard to AQRV impairment. Begin to review and update 2010 Contingency Plan. Continue tracking of nitrogen deposition reduction. Continue collaboration with Agriculture Subcommittee and other stakeholder groups.	Ongoing	Ongoing; Agriculture Subcommittee continues to meet quarterly.
2.5 Protect stratospheric ozone levels through minimizing emissions of CFCs from applicable sources	Equipment registration and facility notification.	Number of equipment items registered, Number of facility notifications	1,647 equipment registrations. 1,734 facility notifications.
	Inspections (both state and local agencies) for compliance with Regulation No. 15.	Number of inspections conducted	1,034 inspections conducted.
	Training and outreach (including pollution prevention).	Ongoing	Training of local health department inspectors is ongoing.
	Continue to negotiate local health department contracts annually for CFC inspections and enforcement.	Ongoing	Local health department CFC contracts are negotiated annually.
2.6 Ensure man-made climate change impacts minimized	Develop policies and regulations as needed to implement the federal GHG rules.	Policies and/or regulations developed to allow state implementation of the federal GHG rules as necessary or directed by EPA.	Ongoing

Program Strategy	Activity	Milestone/Measures	End of Year Status
	Issue Title V and PSD permits for GHG as provided in federal rules.	Ongoing	Issued Title V and PSD permits for GHGs in accordance with federal rules and the June 2014 Supreme Court ruling.
	Monitor and evaluate reduction strategies.	Ongoing	Ongoing
	Monitor legislative activity locally and nationally.	Ongoing	Ongoing
	Continue to coordinate with efforts to implement Governor's Climate Change Initiative and greening Government Executive Order	Ongoing	Ongoing
	Continue to coordinate with efforts to implement Governor's Climate Action Plan.	Ongoing	Ongoing
2.7 Reduce mercury pollution through Colorado Mercury Initiative cross-media programs	CDPHE Strategic Programming process (see discussion in Chapter 2 of PPA). Assist the Water Division development of Mercury TMDLs and ongoing assessment of emissions and deposition.	Ongoing	Ongoing; mercury emission reductions are quantified quarterly (from large stationary sources).

APCD Goal 3: Achieve a level of ambient air quality that protects and preserves standards for visibility and aesthetic concerns for pollutants that cause odors

APCD Sub-goals include:

- Improve Urban Visibility (Denver AIR Program Area and Fort Collins) – Ensure a decrease in the number of days the Colorado Visibility Standard is exceeded in the areas of applicability
- Reduce Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development and implementation of the Colorado Regional Haze SIP
- Control Odors

EPA 2014-2018 Strategic Plan

- **Goal 1: Addressing Climate Change and Improving Air Quality**

Program objective	Activity	Milestone/Measure	End of Year Status
3.1 Reduce pollutants causing haze through the operation of mobile source strategies: Reg. No. 11 – A.I.R. Program Reg. No 12 – Diesel Inspection Smoking vehicles Clean fuels	Described earlier in work plan.	Described earlier Contributed to CDOT/Colorado Energy Office's "Energy Smart Transportation Committee" efforts to promote clean fuels and vehicles, such as CNG and electric vehicles.	Ongoing
3.2 Reduce pollutants causing haze through the operation of the stationary sources program objectives Operation of Construction and Operating Permit Programs Small Business Assistance Program Compliance monitoring and enforcement of stationary sources Wood burning Control Program – High Pollution Advisory Program and state and local woodstove regulations	Described earlier in work plan.	Described earlier	Described earlier
3.3 Support reduction of haze-causing pollutants through regulation updates	Described earlier in work plan.	Described earlier	Ongoing – Regional Haze compliance schedules complete except for one facility. Most facilities will meet Regional Haze limits earlier than required in RH SIP.
3.4 Track program indicators through urban haze monitoring, inventories and modeling	Operate visibility monitoring network in Denver and Fort Collins (transmissometers, nephelometers and Denver web camera).	Ongoing	Ongoing
	Air quality "Action Day" forecasts year-round	Ongoing	Ongoing
	Conduct sample speciation and chemical mass balance modeling	Ongoing Supports exceptional event technical documents.	Ongoing as needed.

Program objective	Activity	Milestone/Measure	End of Year Status
	Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests.	Ongoing	Ongoing
	Operate and maintain gaseous/continuous sites statewide.	Ongoing	Ongoing
	Operate and maintain particulate monitoring sites statewide.	Ongoing	Ongoing
	Operate and maintain Meteorological Monitoring Equipment.	Ongoing	Ongoing
	Air Quality Forecasting and Air Quality Index (AQI) Reporting on a daily basis.	Ongoing	Ongoing
3.5 Implement the Colorado Regional Haze SIP	Develop SIP strategic plan to coordinate, to the extent allowed, planning efforts for ozone and Regional Haze.	Ongoing	Ongoing – Regional Haze compliance schedules complete except for one facility. Most facilities will meet Regional Haze limits earlier than required in RH SIP.
3.6 Support Class I Attributable Visibility Impairment Visibility SIP	Assemble and analyze IMPROVE monitoring data using statistical methods such as factor analysis, trajectory models, and chemical mass balance models. Develop computer programs to assist with processing of improve data for analysis.	Ongoing, as needed.	Ongoing
	Provide technical assistance to various visibility workgroups as requested.	Ongoing	Ongoing
	Continue to work resolve certification issues.	Ongoing	Ongoing
	Three-year review of federal land manager activities as required by SB 17 developed.	Ongoing	Ongoing
	Participate in SIP calls.	Ongoing	Ongoing
3.7 Continue implementation of effective fire and smoke management and prescribed fire program	Develop and revise, as needed, Wildfire Response Plan and Protocol. During wildfire events and large prescribed fires, assist land managers in conducting PM monitoring. Coordinate with public information officer and meteorologist.	Ongoing	Ongoing

Program objective	Activity	Milestone/Measure	End of Year Status
	Participate in the Front Range Fuels Partnership as appropriate.	Ongoing	Ongoing
	Work with local communities and partnerships to address wildland fuels treatment as needed.	Ongoing	Ongoing
3.8 Track program effectiveness indicators through haze monitoring, inventories and modeling	Coordinate with Federal agencies and private entities conducting visibility, lake chemistry and acid deposition monitoring and research in Colorado. Agencies and contractors, to varying degrees, are also involved in AQRV model development.	Ongoing	Ongoing
	Perform audits of IMPROVE samplers.	Ongoing	Ongoing

4.0 Water Quality Control Division – FY2015 Work Plan Status and Accomplishments

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES						
EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
Goal 2: Protecting America's Waters						
Objective 2.1 Protect Human Health						
Subobjective 2.1.1 Water Safe to Drink						
2.1.1	SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	92%		Monitor self-reported data submitted by the state's drinking water suppliers, to ensure that reported data meet all existing federal and state requirements; ensure reported data are accurately entered into the state's data system; and that violations are determined and responded to. Measure state outcomes against national targets.	98.6%
2.1.1	SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	90%		See state commitment narrative for SDW-211.	86.4%
2.1.1	SDW-SP2	Percent of "person months" (i.e. all persons served by community water systems times 12 months) during which community water systems provide drinking water that meets all applicable health-based drinking water standards.	95%		See state commitment narrative for SDW-211.	Colorado is not able to generate this measure and continues to rely upon EPA to do so.
2.1.1	SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	49% (national) 32% (regional)	16%	Report to EPA the population numbers served by community water systems where "minimized risk is achieved by substantial implementation" of source water protection actions, as determined by Colorado.	One hundred fifty-three (153) community water systems and their associated source water areas were reported with "minimized risk achieved by substantial implementation". This equates to approximately 18% of community water systems in Colorado. Approximately twenty-four (24) protection planning grant applications were received in 2015. These protection planning efforts have assisted us in achieving our sixteen (16%) percent goal outlined in the FY2015 Region 8/State PPA target setting table.

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
2.1.1	SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	59% (national) 32% (regional)	15%	<ol style="list-style-type: none"> 1. Reduce potential consumer exposure of community drinking water systems to various contaminants in raw water sources. 2. Report to EPA the number of source water areas with “minimized risk achieved by substantial implementation” of source water protection actions as determined by Colorado. 	Approximately 41 percent of the population served by community water systems has “minimized risk by substantial implementation”. This population percentage has increased significantly due to Denver Water’s protection plan completion. The numbers are expected to continue increasing in future reporting years. This is based on the number of source water protection planning grant applications received in 2015 and coordination with some large water providers (e.g., Fort Collins). Colorado has exceeded the fifteen (15%) milestone / performance measure agreed to in the FY2015 Region 8/State PPA target setting table.
2.1.1	SDW-01a	Percent of community water systems (CWSs) that have undergone a sanitary survey within the past three years (five years for outstanding performers or those ground water systems approved by the primacy agency to provide 4-log treatment of viruses).	81%		<ol style="list-style-type: none"> 1. Eliminate sanitary defects at public water systems that could increase the risk that contaminated drinking water will be distributed to consumers. 2. Conduct sanitary surveys (eight-part) at public water systems as required by Primary Drinking Water Regulations. 3. The state will enter into SDWIS/STATE, the most recent sanitary survey date completed in the last three (3) years for all Subpart H Community Water Systems which have received a survey consistent with the eight-part requirements of 40 CFR 142.16(b)(3) by January 31. 4. In accordance with 40 CFR 142.15(a)(5), the state shall submit to the Region 8 Drinking Water Unit a list of all Subpart H Systems that have had a Sanitary Survey meeting the eight part requirements of 40 CFR 142.16(b)(3) during the prior calendar year by the end of January. Colorado will meet its obligation for such a list by entering the completion date of each required Subpart H System survey into SDWIS/STATE and will submit to the Region 8 Drinking Water Program an evaluation of its program for conducting Subpart H System Sanitary Surveys in accordance with 40 CFR 142.16(b)(3) during the prior calendar year as required 	<ol style="list-style-type: none"> 5.(a) Community groundwater 474 sanitary surveys performed 18 (3.7%) not surveyed (b) Community surface water systems 347 sanitary surveys performed 33 (8.7%) not surveyed (c) Non-community water systems 1,046 sanitary surveys performed 63 (5.7%) not surveyed

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES						
EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
					by 40 CFR 142.15(a)(5) by February 15. 5. Provide in the end-of-year report the number of CWSs that have undergone a sanitary survey and the number and percentage of systems not surveyed within required timeframes in each of the following categories: a) Community groundwater systems not surveyed in the last 3 years; b) Community surface water systems not surveyed in the last 3 years; c) Non-community water systems not surveyed in the last 5 years.	
2.1.1	SDW-15	Number and percent of small CWS and NTNCWS (<500, 501-3,300, 3,301-10,000) with repeat health based Nitrate/Nitrite, Stage 1 D/DBP, SWTR	Indicator		See state commitment narrative for SDW-211.	This is a new measure as of FFY15. There has not been information provided by EPA regarding the 'repeat violations' language in the measure text. Colorado is not able to generate this measure and
2.1.1	SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards.	Indicator		See state commitment narrative for SDW-211.	This is a new measure as of FFY15. Colorado does not have SDWIS service area designations for all schools and daycares and is therefore not able to generate this measure.
Subobjective 2.1.2 Fish and Shellfish Safe to Eat						
2.1.2	FS-1a	Percent of river miles where fish tissue were assessed to support waterbody-specific or regional consumption advisories or a determination that no consumption advice is necessary. (Great Lakes measured separately; Alaska not included) (Report every two years)	Indicator	N/A	1. Issue or rescind Fish Consumption Advisories where appropriate. 2. Update on National List of Fish Advisories. 3. Implement statewide fish consumption guidelines.	1. WQCD FCA website updated regularly as information is developed. 2. Participated in the update of the national List of Fish Advisories as requested by EPA. 3. WQCD developed and implemented statewide fish consumption guidelines.
2.1.2	FS-1b	Percent of lake acres where fish tissue were assessed to support waterbody-specific or regional consumption advisories or a determination that no consumption advice is necessary. (Great Lakes measured separately; Alaska not included) (Report every two years)	Indicator	N/A	1. Issue or rescind Fish Consumption Advisories where appropriate. 2. Update on National List of Fish Advisories. 3. Implement statewide fish consumption guidelines.	1. WQCD FCA website updated regularly as information is developed. 2. Participated in the update of the national List of Fish Advisories as requested by EPA. 3. WQCD developed and implemented statewide fish consumption guidelines.

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES						
EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
Subobjective 2.1.3 Water Safe for Swimming						
2.1.3	SS-1	Number and national percent, using a constant denominator, of Combined Sewer Overflow (CSO) permits with a schedule incorporated into an appropriate enforceable mechanism, including a permit or enforcement order, with specific dates and milestones, including a completion date consistent with Agency guidance, which requires: 1) Implementation of a Long Term Control Plan (LTCP) which will result in compliance with the technology and water quality-based requirements of the Clean Water Act; or 2) implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy; or 3) completion of separation after the baseline date. (cumulative)	790 (92%)	N/A	Colorado has no CSOs.	N/A
Objective 2.2 Protect and Restore Watersheds and Aquatic Ecosystems						
Subobjective 2.2.1 Improve Water Quality on a Watershed Basis						
2.2.1	WQ-SP10.N11	Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained. (cumulative)	3,979 (national) 376 (regional)	0	1. Targeted number of water segments fully restored in FY14 (SP-10); 0. 2. Targeted number of water quality impairments restored in FY14 (SP-11); 0.	This information will be available in the 2014/2016 Integrated Report. The targeted number of water segments fully restored was zero.
2.2.1	WQ-SP11	Remove the specific causes of waterbody impairment identified by states in 1998. (cumulative)	12,514 (national) 798 (regional)	0	1. Targeted number of water segments fully restored in FY14 (SP-10); 0. 2. Targeted number of water quality impairments restored in FY14 (SP-11); 0.	This information will be available in the 2014/2016 Integrated Report. The targeted number of water segments fully restored was zero.
2.2.1	WQ-SP12.N11	Improve water quality conditions in impaired watersheds nationwide using the watershed approach. (cumulative)	446 (national) 59 (regional)	1	FFY15 – 1 watershed.	One NPS success story for the Kerr/Swede Gulch watershed was documented. Implementation of NPS controls to address E. coli led to de-listing of COSPBE05, Kerr/Swede portion.

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
2.2.1	WQ-03a	Number, and national percent, of states and territories that within the preceding three year period, submitted new or revised water quality criteria acceptable to EPA that reflect new scientific information from EPA or other resources not considered in the previous standards.	37 (national) 66.1% (national) 4 (regional)	N/A	Continually review water quality standards and revise them if necessary in accordance with State and Federal statute and Water Quality Control Commission schedule. 1. Scoping Hearing Reg #31: 10/2014. 2. Formulation Hearing Reg #38: 11/2014. 3. Rulemaking Hearing All Regs (Temp Mods): 12/2014. 4. Rulemaking Reg #38: 6/2014. 5. Prepare notice for Temp Mods rulemaking	1. Scoping Hearing Reg #31: completed as scheduled. 2. Formulation Hearing Reg #38: completed as scheduled. 3. Rulemaking Hearing All Regs (Temp Mods): completed as scheduled. 4. Rulemaking Reg #38: completed as scheduled. 5. Prepare notice for 2015 Temp Mods rulemaking: completed as scheduled. 6. Finalize Policy 98-1, Guidance for Implementation
2.2.1	WQ-09a	Estimated annual reduction in million pounds of nitrogen from nonpoint sources to waterbodies (Section 319 funded projects only).	9.1	N/A	Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects.	Actual, project-specific load reductions and load reduction estimates for new projects were reported in GRTS.
2.2.1	WQ-09b	Estimated annual reduction in million pounds of phosphorus from nonpoint sources to waterbodies (Section 319 funded projects only).	4.5	N/A	Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects.	Actual, project-specific load reductions and load reduction estimates for new projects were reported in GRTS.
2.2.1	WQ-09c	Estimated annual reduction in million tons of sediment from nonpoint sources to waterbodies (Section 319 funded projects only).	1.2	N/A	Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects.	Actual, project-specific load reductions and load reduction estimates for new projects were reported in GRTS.
2.2.1	WQ-10	Number of waterbodies identified by states (in 1998/2000 or subsequent years) as being primarily nonpoint source (NPS)-impaired that are partially or fully restored. (cumulative)	575 (national) 37 (regional, 4 new success stories)	1	FFY15 – 1 watershed.	One NPS success story for the Kerr/Swede Gulch watershed was documented. Implementation of NPS controls to address E. coli led to de-listing of COSPBE05, Kerr/Swede portion.
2.2.1	WQ -11	Number, and national percent, of follow-up actions that are completed by assessed NPDES (National Pollutant Discharge Elimination System) programs. (cumulative)	Indicator	N/A	The division does not currently have any follow-up actions. The division has been notified that EPA intends to audit the permitting program during FFY15.	There were no actions necessary since there were no follow-up actions. EPA did not audit the permitting program in FFY15 and does not plan an audit in FFY16; therefore, no new actions are expected.
2.2.1	WQ-12a	Percent of non-tribal facilities covered by NPDES permits that are considered current. [Measure will still set targets	90% 109,792	74%	The division's priorities for FFY15 are to continue issuing individual permits based on the watershed schedule and to complete the	As of October 1, 2015, 65% of permits included in the backlog measure were considered current. This falls short of the PPA commitment. The division was not

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
		and commitments and report results in both % and #.]			sand and gravel stormwater renewals, the MS4 renewals, the pesticide, and the hydrostatic testing renewal. This means the national target will not be met because the commercial washing and water treatment plant renewals will be deferred.	able to complete the renewal of the sand and gravel permit which was the cause of not meeting the PPA commitment. The division expects to complete the renewal of the sand and gravel permit before the next PPA reporting period.
2.2.1	WQ-13a	Number of MS-4s covered under either an individual or general permit.	Indicator	Report	The division maintains permitted MS4 information in ICIS.	The division has maintained permitted MS4 information in ICIS.
2.2.1	WQ-13b	Number of facilities covered under either an individual or general industrial storm water permit.	Indicator	Report	The division maintains the majority of permitted industrial stormwater information in ICIS. Any permits not maintained in ICIS are reported to EPA through the PMOS database.	The division has maintained permitted MS4 information in ICIS and PMOS.
2.2.1	WQ-13c	Number of sites covered under either an individual or general construction storm water site permit.	Indicator	Report	The division is working to upload construction stormwater permit information to ICIS. If this project is not complete by the end of 2015 then construction stormwater permit information will be reported through the PMOS database.	The division was able to complete an upload of construction stormwater information in ICIS, and the information is being updated weekly.
2.2.1	WQ-13d	Number of facilities covered under either an individual or general CAFO permit.	Indicator	Report	The division maintains permitted CAFO information in ICIS.	The division has maintained permitted CAFO information in ICIS.
2.2.1	WQ-14a	Number, and national percent, of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment Programs that have control mechanisms in place that implement applicable pretreatment standards and requirements.	20,700 98.0%	N/A	Colorado is not delegated for implementation of the pretreatment program; therefore, EPA is the lead authority on measure WQ14a and the EPA Region 8 reports on this national measure.	N/A
2.2.1	WQ-14b	Number, and national percent, of Categorical Industrial Users (CIUs) that are discharging to POTWs without Pretreatment Programs that have control mechanisms in place that implement applicable pretreatment standards and requirements.	Indicator	N/A	Colorado is not delegated for implementation of the pretreatment program; therefore, EPA reports on this national measure. As Colorado has a state pretreatment program, Colorado actively works to permit SIUs in non-pretreatment POTWs and provides that information to EPA.	N/A
2.2.1	WQ-19a	Number of high priority state NPDES permits that are issued in the fiscal	475	See status report	The division will enter a high priority permit commitment into the PMOS database. The	The division selected 31 high priority permits for FFY15 and needed to issue 25 to meet the 80%

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES						
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		year.			division will submit the number of priority permits within 30 days of receiving the draft list from EPA.	issuance goal in the rules for the high priority permit measure. A total of 23 high priority permits were issued. The division reported high priority permit results to EPA in PMOS.
2.2.1	WQ-26	Number of states and territories implementing nutrient reduction strategies by (1) setting priorities on a watershed or state-wide basis, (2) establishing nutrient reduction targets, and (3) continuing to make progress (and provide performance milestone information to EPA) on adoption of numeric nutrient criteria for at least one class of waters by no later than 2016. (cumulative)	25.31 (national) 0.33 (regional)	N/A	Continue to implement the Nutrient Criteria Development Plan for Colorado, September 26, 2002, Colorado Department of Public Health & Environment, or any revisions to this plan. Provide work products on the tasks identified in milestone schedule and number of applicable standards actions.	Work items completed as scheduled (TP and chlorophyll water quality standards considered in the So. Platte basin rulemaking). The first phase of Colorado's strategy has been completed in ¼ of the state as scheduled. Chlorophyll standards have been adopted for 396 stream segments and 127 lake segments. Total Phosphorus standards have been adopted for 451 stream segments and 116 lake segments.
2.2.1	WQ-27	Extent of priority areas identified by each state that are addressed by EPA-approved TMDLs or alternative restoration approaches for impaired waters that will achieve water quality standards. These areas may also include protection approaches for unimpaired waters to maintain water quality standards.	8%	0%	Develop a state prioritization strategy under the new 303(d) Vision that would be used to identify: 1) a list of priority waters for near term (approx. 2 years) TMDL development or alternative approach; 2) a list of priority waters scheduled for likely TMDL development or alternative approaches from 2016 -2022; 3) the strategic rationale of the state in setting these priorities. Timeline: January 1, 2015 draft prioritization strategy; June 1, 2015 develop draft 2022 and FY 16 targets for WQ-27 using the draft prioritization strategy; September 30, 2015 final prioritization strategy and final 2022 and FY16 WQ-27 targets. Participate in regular (approx. monthly) calls with EPA to collaborate on: the prioritization strategy; the state's efforts to address the other 303(d) Vision goals; and the state's progress in developing FY15 TMDLs and TMDL alternatives.	A draft prioritization strategy was produced and was applied to the 2012 list of impaired waterbodies which resulted in draft and final 2022 and FFY16 WQ-27 targets being identified and reported to EPA. Outreach was also conducted as part of strategy development, and the TMDL workgroup participated in regular discussions with EPA about development and implementation of the prioritization strategy.
2.2.1	WQ-28	State-wide extent of activities leading to completed TMDLs or alternative restoration approaches for impaired	Indicator	N/A	N/A	Draft TMDLs for COSPUS15 (third-party) and COARMA18a were public noticed. Draft TMDLs for COARLA01a and tributaries were produced but not

TABLE 1: FFY15 NATIONAL WATER PROGRAM GUIDANCE MEASURES						
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		waters, or protection approaches for unimpaired waters.				public noticed because the division's 2016 Regulation 93 proposal identified COARLA01a and some tributaries for de-listing. The TMDL workgroup collected samples in preparation for TMDL development in the Lower, Middle and Upper Arkansas, Lower Colorado, Cache La Poudre and Yampa River. Outreach and scoping discussions were conducted for TMDLs for: COSPSV04abc; COSPUS15; COARMA18a; COARLA01A and tribs; COARMA04a; COGUUC07_08_10_11_12; COSPBT01; COARLA01b_04_09ab_MA12; COARFO01a_02ab_04; and COSPCL02_03_06_09_11_13. Scoping discussions for alternative approaches to address the COSPBE02 E. coli impairment and the COARLA01c_09ab selenium impairment were also conducted.

TABLE 2: FFY15 NATIONAL OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE GUIDANCE MEASURES						
EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
5	SDWA02	<p>During FY15, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2014 ETT report. State, territory and tribal breakouts shall be indicated in the comment field of the Annual Commitment System.</p> <p>Please note: A primacy agency's success at addressing violations will be</p>			<ol style="list-style-type: none"> 1. Annotate the quarterly Enforcement Targeting Tool (ETT) list created by the Enforcement Response Policy (ERP) by indicating the state actions planned for each identified priority ETT system, the projected timeframe for such actions and other relevant information that helps EPA evaluate candidates for federal enforcement. Return the annotated list to EPA within 30 calendar days of receipt. 2. Address all priority ETT systems (through formal enforcement or appropriate return to compliance) within 6 months of their being 	<ol style="list-style-type: none"> 1. This commitment was met. Colorado obtains the quarterly ETT lists when they become available, provides the specified information and returns the annotated list to EPA within 30 calendar days of receipt. 2. Colorado believes that this commitment has been met. However, generating this measure is difficult with the ETT; as such, Colorado relies upon EPA to advise us if enforcement commitments have not been met. 3. This commitment was met. Colorado provides, via electronic mail, a copy of all final enforcement documents to EPA at issuance.

TABLE 2: FFY15 NATIONAL OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE GUIDANCE MEASURES

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
		tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2015 SDWA ACS measure with respect to a priority system if the score for that system has been brought below, and remains below, eleven.			identified as priorities, with the goal of taking action before systems reach the priority status. The date that the state receives the ETT from EPA is day zero (0) of the six-month timeliness period. 3. Provide EPA with access to state PWS files and data for EPA's oversight purposes at the state's offices. Provide EPA a copy of all final settlement agreements, both administrative and judicial, upon issuance or EPA request. Copies of actions will be provided to EPA Region 8 in electronic format unless EPA requests a hard copy. Upon request make penalty calculations and supporting documentation available to EPA.	Where a penalty is issued, the associated calculations are included with the issued order.
	CWA07	NPDES Compliance Monitoring Strategy (CMS) plan for each authorized state in the region and a regional plan wherever EPA direct implementation occurs (i.e., non-authorized states, territories, Indian country, pretreatment, etc.), targeting the most significant sources with potential to impact water quality. Each CMS plan should be developed in accordance with the guidelines in Part 1 of the 2014 revised CMS. Any proposed alternative CMS plan should be provided to OECA for consultation and review by August 15, 2014. By December 31, 2015, provide for each state and direct implementation area, a numerical end of year report on EPA and state inspection plan outputs, by category and subcategory. To increase the transparency of NPDES inspection data, OECA will make this data available to the public.		Report	Colorado's draft 2015 NPDES Compliance Monitoring Strategy (CMS) plan will be provided to EPA by September 1, 2014, and the plan will be finalized within 15 days of receiving Region 8 EPA's comments or by October 1, 2014. Division will take into consideration the EPA draft 2014 CMS. Colorado's draft 2016 NPDES Compliance Monitoring Strategy (CMS) plan will be provided to EPA by August 15, 2015, and the plan will be finalized within 15 days of receiving Region 8 EPA's comments or by October 1, 2015.	Colorado submitted the 2015 NPDES Compliance Monitoring Strategy (CMS) plan to EPA on September 2, 2014 and finalized on October 1, 2014 when no comments were received from EPA. Colorado submitted the 2016 NPDES Compliance Monitoring Strategy (CMS) plan to EPA on August 28, 2015. An extension until August 31, 2015 was requested due to response efforts to address the Gold King Mine release. This extension was granted, and the plan was finalized on October 1, 2015 when no comments were received from EPA.

TABLE 3: FFY15 REGIONAL ECOSYSTEMS PROTECTION PROGRAM GUIDANCE ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
Goal 2: Protecting America's Waters						
Objective 2.1 Protect Human Health						
Subobjective 2.1.1 Water Safe to Drink						
2.1.1	N/A	State, Tribal and Federal water resource management agencies need to effectively manage all ground-water resources in a way that promotes sustainable use of the resource and protects vital ecological resources that rely on ground-water discharge.	N/A	N/A	N/A	N/A
Objective 2.1 Protect and Restore Watersheds and Aquatic Ecosystems						
Subobjective 2.2.1 Improve Water Quality on a Watershed Basis						
2.2.1	N/A	Continue to provide funding for nonpoint source priority program elements and priority projects to identify solutions to nonpoint source pollution. (Section 319 – Funded FTE detail per new NPS Guidance) 90% - Randal Ristau 95% - Position 0225 70% - Position 1403 100% - Bonnie Pate 100% - Lucia Machado Management oversight – 4 positions at 4%, 13%, 19%, and 50% Fiscal support – Division at 4%	N/A	N/A	1. Complete priority program elements such as planning for management plan update, refining program aspects if necessary to make sure new EPA guidance is addressed, supporting the NPS Alliance, updating or completing new MOUs if necessary, and federal consistency reviews. 2. Identify NPS projects to be developed for high priority watersheds and solicit local support for developing these priority projects. 3. Prepare statewide project funding list for public hearing by the WQCC. 4. Submit project implementation plans for EPA Region 8 approval. 5. Assure projects meet all federal and state reporting requirements. 6. Report project specific progress into GRTS with systematic updates biannually.	1. All priority program elements, including those listed, were accomplished. 2. NPS priority projects were identified and marketed. 3. The statewide funding recommendation to the WQCC was completed and public noticed. 4. All project implementation plans were submitted for EPA approval. 5. All project and program elements met federal and state reporting requirements. 6. Project-specific progress was reported in GRTS biannually, at a minimum. 7. The grant performance measures template was utilized. 8. Project effectiveness for implementation projects was evaluated through the development, approval and implementation of sampling and analysis

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					<p>7. Utilize EPA State Grant Performance Measures template for service area-specific requirements.</p> <p>8. For implementation projects, ensure sampling and analysis plans are developed and implemented to assess pre- and post-project water quality related data to document project effectiveness.</p> <p>9. Continue development and implementation of MRP to address effectiveness monitoring of NPS projects.</p> <p>10. In conjunction with the Environmental Data Unit, conduct pre- and post-project monitoring for select projects to document long-term success.</p>	<p>plans to assess pre- and post-project water quality.</p> <p>9. The Measurable Results Program was implemented with particular focus on identifying success stories and evaluating effectiveness of the National Water Quality Initiative conservation practices implemented in the Grape Creek watershed.</p> <p>10. Sampling and analysis associated with NPS projects was coordinated with the Environmental Data Unit and a plan was drafted to better define roles and responsibilities and expectations with respect to NPS program support.</p>
2.2.1	N/A	Ongoing or planned TMDLs that will be completed in FY15.	N/A	27	Submit 27 TMDLs for EPA approval as projected in draft list provided to EPA.	14 TMDLs from the list of projected FFY15 TMDLs were submitted and 14 TMDLs were approved.

TABLE 4: FFY15 REGIONAL OFFICE OF ENFORCEMENT, COMPLIANCE, AND ENVIRONMENTAL JUSTICE GUIDANCE ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
Cross-Program Initiatives						
N/A	N/A	States should incorporate environmental justice into their programs and document their commitments in the Agreement.	N/A	N/A	The division will include consideration and evaluation for meeting environmental justice in its 2014 Clean Water CMS.	The division developed screening criteria to identify and track enforcement cases with potential EJ concerns. Beginning July 1, 2015, the division began screening clean water cases for potential EJ concerns with the goal of: 1) identifying ways in which our work can be enhanced to advance the department's EJ goals; and 2) provide a means to measure the enforcement work we are doing in areas with EJ concerns. The division is also engaged in

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EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
						developing the criteria for incorporating EJ into enforcement work which will be implemented through a department wide policy.
Clean Water Program						
N/A	N/A	The state agency must maintain national databases.	N/A	N/A	<p>For all domestic and industrial entities (including select stormwater sector permits) with NPDES permits, the division intends to enter permit facility data, permit event data and inspection data, including SSO Inspections, and enforcement actions into ICIS. The division commits to reenter permit facility data, permit event data and inspection data, including SSO Inspections, into ICIS for existing permitted facilities as the permits are renewed and for new facilities as the permits are issued.</p> <p>CDPHE opts to maintain ICIS-NPDES and have data for the annual non-major facilities noncompliance report pulled by EPA in lieu of annual reporting.</p>	<p>Permit information was entered and maintained in ICIS for all permits for all domestic and industrial facilities and select stormwater permits.</p> <p>All NPDES permit inspection data was entered into ICIS.</p> <p>The division conducted 3 collection system inspections in FFY15.</p> <p>All enforcement actions for FY15 were entered into ICIS, regardless of sector.</p> <p>While the division maintains data for the annual non-major facilities noncompliance report in ICIS, corrections to the ANCR were manually reported to EPA in FY15 as well.</p>
N/A	N/A	States are asked to provide projections of program activity for regional and state inspections.	N/A	N/A	Provided in the CMS.	See commitment text.

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N/A	N/A	Clean Water Act Action Plan.	N/A	N/A	The state and EPA will work together to implement the Clean Water Act Action Plan. The state and EPA will conduct planning meetings including NPDES compliance and enforcement, permitting and water quality standard personnel to identify water quality issues of greatest concern for each state, and develop collaborative annual work plans to leverage both state and EPA resources to address these issues. A collaborative work plan will be developed prior to September 15, 2014 for FFY15.	This commitment was met. The state worked with EPA to implement the Clean Water Action Plan and met as scheduled to discuss the plan.
N/A	N/A	Evaluate violations and determine an appropriate response as identified in Colorado's Enforcement Management System. Where violations cause or threaten water quality impacts, determine an appropriate response consistent with priorities established in the Clean Water Action Plan and associated Division work plan strategies that focus on achieving environmental outcomes.			<p>Continue to implement the Stormwater Enforcement Response Guide following consideration of available enforcement resources and strategic work plan priorities.</p> <p>Continue to implement the CAFO Enforcement Response Guide following consideration of available enforcement resources and strategic work plan priorities.</p> <p>Continue to implement the Enforcement Response Guide for major/minor domestic and industrial wastewater dischargers, including the enforcement response procedures for whole effluent toxicity (WET), following consideration of available enforcement resources and strategic work plan priorities. Submit as part of the State End-of-Year Report:</p> <ul style="list-style-type: none"> • A list of facilities who entered into a TIE or TRE in FY15; and • A list of any formal enforcement actions taken in FY15 that included 	<p>This commitment was met. All stormwater violations that met the formal enforcement response criteria were reviewed and, absent resource limitations, responded to with formal enforcement as appropriate and warranted.</p> <p>This commitment was met. All CAFO violations that met the formal enforcement response criteria were reviewed and, absent resource limitations, responded to with formal enforcement as appropriate and warranted.</p> <p>This commitment was met. All violations by major/minor domestic and industrial wastewater dischargers were reviewed and, absent resource limitations, responded to with formal enforcement as appropriate and warranted.</p> <p>Accelerated testing was completed by nine (9) entities as part of the required WET automatic compliance response. One or more PTIE/TIE was completed by eight (8) entities as part of the required WET automatic compliance response. A TRE was/is being completed by three (3) entities as part of the required WET</p>

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EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
					<p>WET violations. A list of any formal enforcement actions taken in FY15 that included WET violations.</p> <p>Quarterly during the fiscal year, the division will provide a response to the Quarterly Non-Compliance Report (QNCR), including an explanation of what the division is doing to respond to the facilities in Significant Non Compliance (SNC) on the QNCR.</p>	<p>automatic compliance response. The division worked with four (4) entities to develop and approve specific WET compliance plans that will be implemented during each entity's report only period. The division is working with one (1) entity to develop and approve a WET corrective action plan for a new treatment system designed to allow the entity to meet WET limits. One (1) entity has decided to cease discharge due to tracked selenium and WET failures. No formal enforcement actions were taken based solely on WET violations. However, copies of enforcement actions that may have included WET violations were provided to EPA as those enforcement actions were issued.</p> <p>This commitment was met. Each quarter during FFY15, following notification from EPA, the division provided a response to the QNCR that included an explanation of what the division was doing to respond to major facilities in SNC.</p>
N/A	N/A	EPA will perform inspections in regional and national enforcement initiatives according to national and regional guidance and the national 2014-2018 Performance Based strategies and the collaborative annual work plans. The enforcement initiatives include: Municipal Wet Weather Infrastructure; Concentrated Animal Feeding Operations (CAFOs); and Energy Extraction. EPA will conduct inspection follow up and enforcement for those facilities it inspects.	N/A	N/A	N/A	N/A
N/A	N/A	States are encouraged to continue piloting the Wet Weather SNC Policy in FY15. States are also encouraged	N/A	N/A	CDPHE will implement its Single Event Violation (SEV) business process in FFY15 in order to generally implement the EPA Wet	All significant (SNC) CAFO violations were entered into ICIS. All enforcement actions containing significant (SNC) wet weather violations were

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EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
		to provide feedback in FY14 to the EPA on the SNC Policy if they have piloted it in prior fiscal years.			Weather SNC Policy. This includes entering significant (i.e., SNC) Wet Weather single event violations and enforcement actions into ICIS. CDPHE will provide updates to EPA regarding the SEV process during quarterly meetings.	<p>entered into ICIS.</p> <p>All significant (SNC) SSO violations will be entered into ICIS by January 31, 2016.</p> <p>CDPHE provided updates on its Single Event Violation (SEV) business process to EPA during quarterly meetings in FFY15.</p>
N/A	N/A	Continue to implement the Sanitary Sewer Overflow (SSO) Response Strategy until such time as the SSO regulations are finalized.	N/A	N/A	<p>Provide to EPA by October 15 of each year:</p> <ol style="list-style-type: none"> 1. An updated SSO inventory; 2. The number of NPDES inspections targeted to evaluate SSO issues; 3. The number and percent of SSO inspections in priority watersheds (i.e., 303(d) listed for E. coli) including the name of the priority watershed (beginning with the October 2013 report); 4. The number and type of informal and formal enforcement actions taken in response to SSOs; 5. The percent of enforcement actions in priority watersheds for SSOs (beginning with the October 2013 report); and 6. A list of SSOs addressed. <p>Copies of all SSO inspections and enforcement actions will be submitted to EPA.</p>	<p>Division provided an item-specific report to the EPA on October 14, 2015 that addressed each of these items. Please refer to the delivered report for detailed information.</p> <p>Copies of any enforcement actions addressing SSO violations were provided to EPA upon issuance.</p>
N/A	N/A	Continue to conduct the DMR Quality Assurance Program.			Follow up on all significant problems with DMR QA and provide EPA with a summary of follow-up actions in the state end-of-year report.	DMR QA Study 35 was conducted in the state of Colorado for the calendar year 2015. DMR QA Study 35 closed on July 10, 2015, and any necessary corrective action reports were due no later than October 23, 2015. One hundred twenty-six (126) major facilities were required to participate in DMR QA Study 35. Nine (9) minor facilities and one (1) federal facility voluntarily participated in the study. Of the 126 facilities that were required to participate, 124

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						<p>facilities actually participated in the study.</p> <p>Of the 124 participating facilities, thirty-eight (38) facilities submitted data with unacceptable results. Twenty-eight (28) of these facilities remedied the unacceptable results with corrective actions. An additional one (1) facility is in the process of ordering necessary equipment to complete their corrective action. One (1) of the thirty-eight (38) facilities produced acceptable retest results but did not indicate what corrective actions had been implemented. The remaining eight (8) facilities did not respond to the unacceptable results and the division remains currently unaware of the status of any corrective actions or retests.</p> <p>The two (2) facilities who did not participate also failed to participate last year. The eight (8) who have yet to respond to unacceptable results do not indicate recurring issues from DMR QA 34.</p> <p>The division is continuing to review and follow up with noncompliant facilities and may recommend sampling investigations for those facilities that fail to participate in future DMR QA studies, have recurring unacceptable results, fail to complete follow-up investigations or otherwise have questionable results and/or response actions.</p> <p>The division does not have the authority to enforce against noncompliant facilities, as the requirement to participate in the DMR QA is based on the federal government's section 308 authority, for which Colorado does not have a corresponding statute.</p>
N/A	N/A	The EPA has completed a compliance	N/A	N/A	EPA Region 8 will lead the assessment of	Division coordinated with EPA Region 8 on an

TABLE 4: FFY15 REGIONAL OFFICE OF ENFORCEMENT, COMPLIANCE, AND ENVIRONMENTAL JUSTICE GUIDANCE ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
		assessment of 75% of Phase I MS4 permittees (4 out of 5). All Phase I MS4 issues will be addressed by FY16.			the remaining Phase I permittees consistent with the completed assessments. Although the assessments will be led by EPA Region 8, CDPHE will coordinate with and support EPA Region 8's activities. CDPHE will communicate with EPA Region 8 to incorporate assessment coordination and support activities into the inspection plan. EPA Region 8 will provide the state with a draft of audit reports in advance of finalizing the report and sending it to the permittee. EPA Region 8 will keep the state informed of any follow-up action in advance if possible.	audit of the CDOT MS4 and ongoing audit follow-up for the Colorado Springs MS4.
N/A	N/A	CAFO Rule update.	N/A	N/A	N/A	N/A
N/A	N/A	Promote communication with EPA.	N/A	N/A	<p>Report to EPA:</p> <ul style="list-style-type: none"> Final settlement agreements; and A description of any SEPs included in the state enforcement actions concluded in the federal fiscal year. <p>Upon request, penalty calculations, including adjustments and BEN for state enforcement actions concluded during the fiscal year, will be made available to EPA at the state's offices.</p> <p>Quarterly meetings between EPA and the division will be held to discuss current and projected enforcement cases, inspection commitments, work conducted in priority areas and sectors, environmental justice issues and any other items as necessary.</p>	<p>The division provided EPA with copies of all settlement agreements at the time each action was issued. SEP descriptions were contained within those documents.</p> <p>The division did not receive any requests from EPA to review penalty calculations.</p> <p>All quarterly meetings were held unless EPA and the division agreed otherwise.</p>
Drinking Water Program						
N/A	N/A	The state agency must maintain national databases.	N/A	N/A	1. The state commits to entering all sanitary surveys performed within 90	1. This commitment was met. 2. This commitment was met. Required data are

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EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
					<p>days of completion of field work in the previous inspection year into SDWIS/FED (by December 31 for inspections conducted in the previous FFY).</p> <p>2. Upload all violations, enforcement actions and applicable return-to-compliance codes into SDWIS the quarter following their occurrence.</p> <p>3. Ensure that all enforcement actions are linked to violations in SDWIS to avoid orphan exceptions, except for the approved orphan actions identified in guidance.</p>	<p>uploaded to SDWIS/FED quarterly.</p> <p>3. This commitment was met.</p>
N/A	N/A	Adopt regulations within statutory deadlines or EPA approved extension schedule.	N/A	N/A	<p>1. Colorado currently has primacy enforcement authority for all existing rules. Colorado will submit primacy applications or apply for extensions before statutory deadlines, including either adopting or applying for an extension for the Revised Total Coliform Rule prior to February 13, 2015. Colorado commits to maintaining and implementing regulations that are at least as stringent as the federal Safe Drinking Water Act.</p> <p>2. Colorado's Increased Readability Rulemaking (IRR) project was undertaken to improve readability of Colorado's drinking water regulations in accordance with the governor's initiative to improve efficiency and reduce unneeded regulations. The changes to the drinking water regulations that resulted from the IRR project became effective in March 2014. Because of the significant reorganization of the rewritten regulation, EPA's review generated a significant number of comments. EPA and Colorado commit to addressing</p>	<p>1. This commitment was met. On November 26, 2014, Colorado submitted an application for extension of the February 2015 RTCR primacy package submittal deadline to June 30, 2015 and was granted the extension by EPA. Colorado submitted the full RTCR primacy package on June 30, 2015.</p> <p>2. This commitment was met. Colorado continues to work with EPA regarding EPA's comments that resulted from the Increased Readability rewrite of Colorado's drinking water regulations that became effective in March 2014. Colorado maintains and implements regulations that are at least as stringent as the federal Safe Drinking Water Act. Colorado communicates on other primacy issues as appropriate.</p>

TABLE 4: FFY15 REGIONAL OFFICE OF ENFORCEMENT, COMPLIANCE, AND ENVIRONMENTAL JUSTICE GUIDANCE ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
					EPA's comments and issues related to stringency.	
N/A		Implement all primary Drinking Water Regulations for which Colorado has been delegated primary enforcement authority.			<p>Colorado will report on the status of the following EPA-identified requirements of the surface water treatment rule:</p> <ol style="list-style-type: none"> 1. By November 15, provide to EPA a list of all systems that are required to filter under the SWTR but are not yet filtering. Report the violations to SDWIS-FED. For systems on compliance schedules, provide the schedule from the enforcement document. If any system is not under a compliance schedule, provide a rationale and proposed action and time frame for securing compliance. 2. In FY 2012 CDPHE developed new methods for making GWUDI determinations. By November 15, 2014, the CDPHE will provide EPA staff with a list of GWUDI determinations made under the new determination method, with the status of compliance with treatment requirements for each system. 	<ol style="list-style-type: none"> 1. This commitment was met. Colorado reports violations to SDWIS-FED and provided the required list and associated information via letter to EPA on November 15, 2014. 2. This commitment was met. Colorado submitted the required information to EPA via letter on September 30, 2014.

TABLE 5: FFY15 COLORADO ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
N/A	N/A	N/A	N/A	N/A	Colorado is not delegated to implement the biosolids program and maintains a state level program with authority over the land application of biosolids. The division will work collaboratively with EPA to implement the state program in a manner at least as stringent as federal requirements to avoid	<p>Six new biosolids land application sites were approved.</p> <p>A total of 67,467 Dry Metric Tons of biosolids were beneficially reused via composting and land application including rangeland and reclamation. In addition, 85.47%</p>

TABLE 5: FFY15 COLORADO ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
					establishing conflicting requirements. EPA and the division will also coordinate oversight to recognize authorities and avoid duplication of effort as outlined in the inspection plan. Colorado will also coordinate with EPA regarding possible termination of the EPA general permit.	<p>of biosolids generated at DWWTTWs in Colorado were beneficially reused during the reporting period.</p> <p>A total of 60 division biosolids land application sites inspections were completed.</p> <p>The division continues to implement a state biosolids program in coordination with EPA to avoid duplication of efforts.</p> <p>The division coordinated with EPA on termination of the biosolids general permit to ensure continued effective regulation of biosolids land application activities in Colorado.</p>
N/A	N/A	N/A	N/A	N/A	<p>Colorado is not delegated to implement the pretreatment program and maintains a state level program with authority over discharges to POTWs and implements requirements in permits to implement water quality standards decisions that at times have a nexus to pretreatment implementation. The division will work collaboratively with EPA to implement the state program in a manner to avoid establishing conflicting requirements. EPA and the division will also coordinate oversight to recognize authorities and avoid duplication of effort both in permitting and in compliance oversight as outlined in the inspection plan.</p> <p>EPA will provide pretreatment language for approved and non-approved programs to CDPHE for incorporation into state-issued NPDES permits.</p>	<p>The division issues Notice of Discharge Requirements (NDRS) in accordance with state regulation to significant categorical and non-categorical and non-significant categorical industrial users that discharge to POTWs without approved pretreatment programs. As of October 1, 2015, there are nine (9) facilities covered by division-issued NDRs.</p> <p>The percentage of Significant Industrial Users in POTWs with Pretreatment Programs is determined by EPA. No division inspections were conducted for pretreatment industrial users.</p> <p>The division continues to implement a state pretreatment program in coordination with EPA to avoid duplication of efforts.</p>
N/A	N/A	N/A	N/A		As requested by Region 8 staff, CDPHE will continue to provide EPA with an electronic copy of industrial and construction stormwater permit information for permits that are not in ICIS on a quarterly basis.	EPA was provided with an electronic copy of industrial and construction stormwater permit information.
N/A	N/A	N/A	N/A		EPA and CDPHE will coordinate on the performance by EPA of inspections in regional and national enforcement initiatives to minimize overlap and the potential for conflicting determinations.	N/A

TABLE 5: FFY15 COLORADO ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
N/A	N/A	N/A	N/A	N/A	<p>CDPHE will continue to implement its monitoring strategy for surface and groundwater (<i>The 10 Elements</i>) and maintain established schedules. CDPHE will:</p> <ul style="list-style-type: none"> Continue implementing Colorado's Water Quality and Assessment Strategy (<i>The 10 Elements</i>) 2004-2014. Develop and finalize Colorado's Water Quality Monitoring and Assessment Strategy (<i>The 10 Elements</i> 2015-2025). Continue to complete the annual feedback loop with EPA R8 to report/discuss progress of <i>The 10 Elements</i> implementation. Develop the enhanced annual monitoring plan by June 30 each year. Work to improve the data flow between CDPHE and EQUIS. Upload state water quality data into national STORET warehouse annually by September 30. 	<p>An enhanced annual monitoring plan was developed and implemented. <i>The 10 Elements</i> document and the Section 106 Categorical grant are used to guide these enhancements.</p> <p><i>The 10 Elements</i> is currently being reviewed and updated. A draft will be submitted to EPA for review. EDU continues to work with the EPA coordinator to keep this document current.</p> <p>An enhanced annual monitoring plan was developed and implemented through the overall water quality monitoring plan in June 2015.</p> <p>EDU staff has made improvements in the procedures for populating EQUIS in a timely and effective manner. This includes a systematic monthly review and preparation of the data.</p> <p>Data collected through June 2015 will be uploaded to STORET by January 31, 2016.</p>
2.2.1	WQ-SP12.N11	Improve water quality conditions in impaired watersheds nationwide using the watershed approach.	N/A	N/A	<p>Colorado will provide the following:</p> <ul style="list-style-type: none"> River, stream and lake segmentation will be available in a GIS Environment; Determine the distribution of water quality standards impairment by watershed; Information from the 303(d) and M&E lists will be managed in a database that can be linked to GIS information; and Identify 10 or 12-digit HUC watersheds where improvements have been demonstrated. 	<p>Colorado continues to work with EPA to make the reach indexed NHD coverage as complete and accurate as possible as basin regulations are revised. Colorado has developed a GIS of the 2012 303(d) List of Impaired Waters and will update this for the 2014/2016 303(d) list.</p> <p>Colorado is developing a new assessment database in a GIS Environment. The 2014/2016 Integrated Report will be submitted using phase I of this database.</p> <p>Several watersheds are being investigated for potential water quality standards attainment, but resolution is still pending. Seeking input and review from EPA and other partners.</p>
N/A	N/A	N/A	N/A	N/A	<p>CDPHE will continue to develop a comprehensive integrated assessment of the conditions of Colorado's waters consistent with 305(b) and 303(d) of the Clean Water Act. CDPHE will:</p>	<p>The process to develop the 2014/2016 Section 303(d) Listing Methodology was completed in March 2015 with significant input from stakeholders. The result of this process is the 2016 303(d) Listing Methodology.</p>

TABLE 5: FFY15 COLORADO ELEMENTS

EPA G/O/S	EPA FFY15 ACS Code	EPA FFY15 Measure Text	EPA FFY15 Planning Target	Colorado FFY15 Commitment	Colorado FFY15 Commitment Text	FFY15 Status and Accomplishments
					<ul style="list-style-type: none">• Provide consistent and accurate assessment of the state's surface waters and provide the information to EPA and the public by developing Colorado's 2014/2016 Section 303(d) Listing Methodology in an open and public process.• Begin to prepare data to support the development of the 2014/2016 Integrated Report.	<p>Data assessment to support the 2014/2016 Integrated Report has been done in preparation for a rulemaking hearing to adopt Colorado's 303(d) List in December 2015.</p> <p>Colorado's 2014/2016 Integrated Report will be submitted on 4/1/2016.</p>

5.0 Hazardous Materials and Waste Management Division-FY2015 Work Plan Status and Accomplishments

Hazardous Waste Program

Mission: To ensure that all hazardous wastes are handled and managed in ways that protects the public and environment from the moment of waste generation until final disposal or destruction.

HW I - General Program Management and Partnership			
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities			
HW 1: Long Term Goal Implement an efficient and effective hazardous waste regulatory program with adequate fiscal and personnel resources.			
Short Term Goals	Objective	Measures	Results
HW 2: Short Term Goal - Develop a partnership between the State and EPA that improves the program. Support this partnership and achieve efficient implementation of a hazardous waste program that reflects the goals and objectives of both the State and EPA including appropriate work sharing.	Authorization The State will pursue timely and complete authorization for new mandatory rules and progress toward overall authorization goals.	FY15: • RCRA Cluster XXIII (SPA 34)	RCRA XXIII – SPA 34 consists of 4 Checklists, 2 optional and 2 non-optional. Colorado has chosen not to adopt state analogs to the 2 optional checklists {Checklist 229 – Conditional Exclusions for Solvent Contaminated Wipes; and Checklist 230 – Conditional Exclusion for Carbon Dioxide (CO2) Streams in Geologic Sequestration Activities}. For the 2 non-optional checklists, Colorado will be adopting state analogs to Checklist 231 {Hazardous Waste Electronic Manifest Rule} in 2016, and is seeking further clarification from EPA regarding why Checklist 232 {Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule} is considered a non-optional rule if the original provisions of the optional 2006 CRT rule (Checklist 215) were never adopted.

HW I - General Program Management and Partnership			
	<i>EPA will work toward a timely review of authorization applications submitted and improve the overall pace of authorization and authorization flexibility.</i>		
	Program Improvement The State will continue to evaluate the Hazardous Waste Control Program seeking to make further program improvements as appropriate.	Continued implementation of self-certification programs and GAP site visits.	Done
	Data Management The State will maintain timely, accurate, and complete data in RCRAInfo. Note: The State is currently a direct user of RCRA Info and translates only new evaluation data. Colorado has applied for an Exchange Network grant to translate compliance data.	The State will have data in RCRA Info by the 15 th day of the month following activity.	Done
		The State will ensure that data is reported to RCRAInfo accurately and completely reflects the status of the RCRA universe.	Done
	The State will continue to work with EPA to ensure that RCRAInfo reports used to track the progress of activity are accurate.	RCRAInfo reporting will include all key measures of operating, closure and post-closure permitting; corrective action; and compliance monitoring and enforcement components of the HW program at a level sufficient to support program evaluation efforts.	Done
	<i>EPA will assist the State in assuring that the RCRAInfo data is current and accurate and reflects EPA HW activities as well as State activities.</i>		
	<i>EPA will work with the State to resolve "universe" issues.</i>		
	<i>EPA will provide training and technical assistance when requested.</i>		

HW I - General Program Management and Partnership			
	The State and EPA will jointly create and generate RCRAInfo reports that are of benefit to the program.		Done
	Public Involvement. The State will continue to involve the public as required by statute and regulation or MOA. This includes a system to respond to requests for information and complaints or concerns from the public.	CDPHE will: <ul style="list-style-type: none"> • Log all complaints and track response and resolution of all complaints. • Log all requests for information and track response and resolution. 	Done
	Resource Level The State will maintain adequate resources to implement the program.		Done
	Financial Accountability The State will adequately account for grant dollars.		Done
	Program Guidance / Agreements The State and EPA will jointly develop and maintain the MOA/EA, Quality Assurance Plan and other operating Guidance.		Done
	Strategic Planning The State and EPA will jointly plan and prioritize program goals, objectives and activities that address state and federal priorities and initiatives. Activities include PPA development, Annual National targets, inspection strategies, planning meetings, etc.	EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts.	Done as necessary

HW I - General Program Management and Partnership			
	Coordination of Joint Activities The State and EPA will maintain a high level of cooperation between State and EPA staff to assure successful and effective administration of the program including evaluation of desirable technical support.	EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts.	Done as necessary
	Program Communication The State and EPA will maintain frequent and open communication on routine matters, changes in program capability, legislation and resources levels, emergency situations and other key activities as described in the MOA.	Examples of key activities include final decisions re: variances / waivers, enforcement actions, biennial report summarization, final permits, etc.	Done as necessary
		EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts.	Done as necessary
	Training and Technical Assistance The State and EPA will jointly identify training and technical assistance needs.	The State will develop and implement a staff training program that results in well-qualified staff and ensures that mandatory training needs are met.	Done
		<i>EPA will make training and technical assistance available to the State and will work toward improving the capability to provide high quality training and technical assistance. Technical assistance will be made available through EPA staff, EPA research labs and EPA contractors.</i>	
	<i>EPA will conduct oversight of State program activities as appropriate.</i>		

<p>HW I - General Program Management and Partnership</p>

<p>HW 3: Short Term Goal – The State and EPA will work together to determine progress in identifying and achieving environmental indicators. Actions necessary to achieve environmental indicators will be planned and tracked. Determination documentation for those facilities “under control” will be provided by the State to EPA; EPA will, in turn, provide guidance for what constitutes “adequate documentation”.</p>		<p>See “Table HW IV” below.</p>	<p>Done</p>
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<p>HW II Operating Permit and Closure/Post Closure Permit Goals</p>
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EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.2 Preserve Land			
<p>HW Operation Permit Universe Information: There is only one (1) commercial land disposal facility operating within the State; as of the end of FY14, this facility has the required permit. There are six (6) operating commercial and non-commercial treatment / storage facilities operating in the State; as of the end of FY14, all required operating permits have been issued. One unit at 1 facility (storage igloos at PCD) is deemed “interim status,” but will be closed before it is permitted. Currently, there are no (0) operating combustion units within the State. An RD&D Permit has been issued for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) facility to allow for construction. Several permit modifications must be approved for PCAPP before pilot-test operations are authorized to begin which is also planned in FY16. PCAPP is approximately 99% constructed and has completed 80% of plant systemization activities.</p>			
Short Term Goals	Objective	Measures	Results

HW II Operating Permit and Closure/Post Closure Permit Goals			
HW 4: Short Term Goal: Issue and maintain operating permits, closure plans, and post-closure permits that include conditions necessary to assure that hazardous wastes are managed in ways that will protect public health and environmental quality. Ensure protection of public health and the environment by inspecting facilities to determine their compliance with permit or closure plan conditions.	Operating Permit Activities. The State will demonstrate progress toward achieving operating permits (OP) program goals, objectives and activities identified in jointly developed strategies that reflect State and EPA OP priorities.	The Key Measure of the OP process is: • OP200 – final determinations / renewal determinations. Supporting Measures include: • OP100 – review activities resulting in a determination or notice of deficiency; • OP240 – permit modifications; and • Emergency Permits.	
		The following output is planned: FY15: • No (0) treatment, storage and disposal facility needs to obtain an operating permit final determination. • No (0) TSD facility is anticipated to obtain a permit renewal.	• No (0) treatment / storage units received an operating permit final determination • No (0) treatment / storage units received a permit renewal
	Permit maintenance; permit modifications, and emergency permits will be processed as required.	Permit modifications and emergency permits will be processed as received and required.	Done
	<i>EPA will conduct operating permit activities according to the joint permitting process described in the authorization memorandum of agreement.</i>		
	<i>EPA will provide technical assistance where requested.</i>		
HW Closure Universe Information: There are or have been thirty-three (33) treatment/storage/disposal facilities with land disposal units on the closure track, and seventy-six (76) land disposal units at these facilities. All of the 76 land disposal units have approved closure plans. Three (3) still need closure certification and agency verifications (DuPont, and Fruita-2). Sixty-one (61) treatment/storage/disposal facilities have treatment or storage units on the closure track. Most of these treatment or storage units have had their closure plans approved. The only units without approved closure plans are units that have been referred to Corrective Action or the CERCLA remedial process. All four (4) treatment/storage/disposal facilities with combustion units have completed the closure process. One (1) former operating TSD (Arvada Treatment Center) has stopped operating and must complete closure; the facility has an approved closure plan.			

HW II Operating Permit and Closure/Post Closure Permit Goals			
HW 4 (cont'd) Issue operating permits	Closure Activities – The State will demonstrate progress toward achieving closure (CL) program goals.	The Key Measure for closure activities is: <ul style="list-style-type: none"> • CL360 - Closure plan approval. • CL380 - Closure verification • CL370 - Closure certification 	
		The following outputs are planned: FY15: <ul style="list-style-type: none"> • No (0) treatment / storage units will receive closure plan approval • Two (2) treatment / storage units will receive closure verification • One (1) closure certification will be approved 	<ul style="list-style-type: none"> • No (0) treatment / storage units received a closure plan approval • No (0) treatment / storage units received a closure verification • No (0) closure certification were approved
	<i>EPA will participate in closure determinations through joint activities and providing technical assistance where requested</i>		
HW Post Closure Universe Information There are twenty-seven (27) facilities in the post-closure universe in the state as of the end of FY12. The Division has lead for all of these facilities excluding three (3) superfund sites. All required post-closure permits or other approved controls are in place.			
Short Term Goals	Objective	Measures	
HW 4 (cont'd) Issue operating permits	Post-Closure Activities – The State will demonstrate program progress toward achieving post-closure (P-C) program goals, objectives and activities that reflect State and EPA P-C priorities.	The Key Measure is: <ul style="list-style-type: none"> • PC200 – final post-closure permit determinations/ issuances. Post-Closure plan approvals, or other approved controls for all applicable units at facilities in the GPRA post-closure universe. Supporting measures are: <ul style="list-style-type: none"> • PC300 – other final post-closure permit determinations / issuances. • PC010 – post closure permit call-ins. 	

HW II Operating Permit and Closure/Post Closure Permit Goals			
		<ul style="list-style-type: none"> • The following major outputs are planned: FY15: • No (0) post-closure permit will be renewed • No (0) other final or other post-closure permit determination / issuance is anticipated. • No (0) post-closure permit call-ins are expected. 	<ul style="list-style-type: none"> • No (0) post-closure permit were renewed • No (0) other final or other post-closure permit determinations / issuances were achieved. • No (0) post-closure permit call-ins were conducted.
	<i>EPA will participate through joint activities and by providing technical assistance as requested.</i>		
HW 5: Short term Goal Develop mechanisms to improve state-to-state cooperation on permitting of promising innovative waste remediation technologies and the development of such technologies.	HW 2.1.3 Participate in Interstate Technology and Regulatory Cooperation Workgroup.		Done
<i>EPA will conduct oversight of State operating, closure, and post-closure permitting activities.</i>			

HW III Compliance Monitoring and Enforcement Goals
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities Goal 5: Enforcing Environmental Laws, Objective 5.1, Supporting Goal 3
HW 6: Long Term Goal Ensure protection of public health and environment through achieving compliance of regulated facilities by implementation of an effective monitoring and enforcement program. Detect and deter violations through inspections and enforcement actions and promote compliance with hazardous waste requirements.

HW III Compliance Monitoring and Enforcement Goals

Outcome Measures:

Return to compliance after enforcement is an important measure of the effectiveness for the enforcement and inspection program. Informal and formal enforcement actions issued in the reporting year are used as the basis for this measure. The measure is the percentage of compliance requirements that are met during the reporting year that they fall due. This measure is expected to be 80% or more in FY15.

Short Term Goals	Objective	Measures	Results
HW 6.1: Short Term Goal Ensure that annual inspection requirements are achieved and that inspections are of high quality. Inspections of treatment, storage and disposal facilities will meet the statutory requirements.	All federal and state TSDs will be inspected. Inspections of state TSDs will be conducted jointly with EPA, with EPA acting as the lead in the inspections.	During FY15, 100% of the compliance inspections required by statute will be conducted.	100% of all required 2015 inspections were conducted.
	All active land disposal facilities will be inspected. All those in post-closure will be inspected every other year (every two years).	CDPHE will submit to EPA, by November 15 of each year, an inspection work plan for the upcoming federal fiscal year, which includes the names of TSD and LQG facilities.	2015 inspection schedule was submitted to EPA before 11/15/14.
	Ground water monitoring inspections will be conducted at active land disposal facilities that have not had such inspections in the previous two years (every three years) or as agreed to by the State and EPA.	A minimum of twenty percent (20%) of all large quantity generators (LQGs) will be inspected during each fiscal year and 100% of all LQGs will be inspected every 5 years.	100 % of LQGs who persisted in the universe over a 5 year period were inspected.
	All treatment and storage facilities will be inspected every other year (every two years).		
	Other Priority Inspection Areas <ul style="list-style-type: none"> - Permit Evaders - Surface Impoundments - Mineral processors - Waste Analysis Plans at commercial TSDFs 		

HW III Compliance Monitoring and Enforcement Goals			
	<i>The Region commits to work with the State to identify 2 TSDFs and 2 LQGs which the Region will inspect as lead. The LQGs will be identified from the national and regional priority sectors, illegal recyclers, entities with violations in more than one state, environmentally sensitive environment, unpermitted surface impoundments, improper medical waste disposal, coal combustion waste facilities, areas of environmental justice concerns and particularly recalcitrant violators.</i>		
HW 6.2: Short Term Goal Maintain a high level of expertise to ensure that quality inspections consistent with national guidance are being conducted.	High quality inspections will be conducted in accordance with national guidance to be reviewed jointly by the State and EPA in the annual assessment.	EPA State Review Framework Evaluation	Done
<i>EPA Region 8 will continue to implement the CERCLA Off-Site Rule (OSR). EPA will continue to coordinate closely with the state in this implementation.</i>			
HW 6.3: Short Term Goal Promote compliance of regulated facilities by ensuring that enforcement actions are timely. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented.	Informal actions will be taken as appropriate within the timeframes established in the HMWMD Enforcement Response Policy.	Compliance Advisories (informal enforcement mechanism) will be used as appropriate and consistent with the State's Enforcement Response Policy.	Done
	Formal enforcement actions, such as administrative orders, judicial referrals and referrals to EPA will be taken as appropriate and within the time frames established in the MOA and the HMWMD Enforcement Response Policy.	Formal enforcement actions will include the use of compliance schedules, assessment of penalties, and escalation of enforcement action as appropriate for the violation and consistent with the HMWMD Enforcement Response Policy.	Done

HW III Compliance Monitoring and Enforcement Goals			
	Enforcement follow-up and other activities will be conducted in accordance with the HMWMD Enforcement Response Policy.	Follow-up will include compliance schedules, follow-up inspections, and compliance assistance and / or escalation of enforcement responses as appropriate and consistent with the HMWMD Enforcement Response Policy.	Done
	<i>The State and Region 8 will work together to move closure/post closure and corrective action facilities to compliance with financial assurance requirements through the development of enforcement cases which may be taken by either the State or EPA. Region 8 will be the lead for entities with facilities in more than one state.</i>	The State and EPA will share any information that is collected regarding the environment and / or public health benefits achieved through inspection and enforcement activities.	Done
	<i>Other national enforcement priority areas: Region 8 will continue to support the multimedia Energy Extraction initiative</i>		
<i>EPA and the State will work jointly to assure that the review of enforcement actions is timely and appropriate in accordance with the Enforcement Response Policy. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented.</i>	<i>EPA will conduct mid-year and end of year file reviews to document the progress CDPHE has made on timeliness of enforcement actions and the appropriate assessment and collection of penalties, including gravity, economic benefit and multi-day penalties.</i>	The State and EPA will have coordination meetings to discuss the compliance and enforcement program. EPA's State Review Framework Evaluation will be used to judge the quality of HMWMD's Program.	Done as necessary

HW IV Corrective Action Goals
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.3 Restore Land
<p>Corrective Action GPRA Universe Information:</p> <p>There are 44 high-priority facilities on Colorado's GPRA 2020 corrective action baseline. Of those facilities, all have been assessed - the RFA is complete (CA050), and all have been prioritized (CA075), according to RCRAInfo.</p>

HW IV Corrective Action Goals			
Short Term Goals	Objective	Measures	Results
HW 7: Long Term Goal Clean up releases of hazardous waste that threaten the public or the environment.	Corrective Action Identification and Ranking The State will demonstrate progress toward achieving corrective action program identification ranking goals, objectives and activities that reflect State and EPA priorities.	The Key Measures for corrective action progress are: <ul style="list-style-type: none"> • CA 050 –assessment completed; • CA 070 – determination of need for RFI; and • CA 075 – corrective action universe ranking. 	
		The following outputs are planned: FY15: All assessment and ranking activities have been completed; therefore, no activities are planned	No (0) assessment, determinations or ranking activities were completed
	<i>EPA will provide technical assistance in identification and ranking activities as appropriate.</i>		
<p>GPRA Corrective Action Universe Information:</p> <p>There are forty-four (44) facilities on Colorado's GPRA 2020 Corrective Action Baseline. All 44 have had the CA process started with at least a RCRA Facility Investigation (RFI) imposed (CA100) for at least one area. Thirty-seven (37) have had RFIs approved (CA200) for at least one area. Thirty-five (35) have had a remedy selected (CA400) for at least one area. Thirty (30) have had a remedy construction completed (CA550). A new Corrective Action 900/999 GPRA measure has been added by headquarters. A CA900 indicates that remedies selected for the protection of human health and the environment have been fully implemented, and the associated performance standards have been attained. CA999 is a corrective action performance standards attained and the corrective action process has been terminated. Region 8 states will be asked for commitments for this new measure to be achieved at the entire facility level. In Colorado, one (1) GPRA facility has achieved Corrective Action Performance Standards Attained (CA900); fifteen (15) have achieved Corrective Action Process Terminated (CA999).</p>			
HW 7: Long Term Goal Clean up releases	Corrective Action Progress The State and EPA will demonstrate progress toward achieving corrective action program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be placed on high-ranked facilities.	The Key Measures for Corrective Action are the following activities: <ul style="list-style-type: none"> • CA100 – Initial RCRA Facility Investigation (RFI) imposed; • CA100 – Subsequent RFI imposed; • CA150 – RFI work plan approved; • CA200 – RFI approved • CA300 – Corrective Measure Study (CMS) work plan approved; • CA350 – CMS approved; • CA400 - Remedy Selection 	

HW IV Corrective Action Goals			
		<ul style="list-style-type: none"> • CA500 – Corrective Measure (CM) work plan approved; • CA550 - Corrective Measures implemented (CMI), construction Completed • CA900 – Corrective Action Performance Standards Attained • CA999 – Corrective Action complete 	
HW 7: Long Term Goal Clean up releases	Corrective Action Progress (Cont'd)	The following key outputs are planned: FY15: <ul style="list-style-type: none"> • No (0) initial RFIs imposed. • No (0) subsequent RFIs imposed. • No (0) RFI work plans approved. • Three (3) RFI reports approved. • Four (4) CMS work plans approved. • Four (4) CMS reports approved. • One (1) remedy selected at the unit level. • No (0) remedies selected at the facility level. • Six (6) CM work plans approved. • Two (2) CMI construction completed at the unit level. • No (0) CMI construction completed at the facility level. • One (1) corrective action completed at the unit level. • One (1) Corrective action performance standards attained/corrective action complete at the facility level 	<ul style="list-style-type: none"> • Three (3) initial RFIs imposed. • No (0) subsequent RFIs imposed. • Eight (8) RFI work plans approved. • Twenty (20) RFI reports approved. • Three (3) CMS work plans approved. • Four (4) CMS reports approved. • Seven (7) remedy selected at the unit level. • No (0) remedies selected at the facility level. • Eight (8) CM work plans approved. • Twelve (12) CMI construction completed at the unit level. • No (0) CMI construction completed at the facility level. • Seventeen (17) corrective action completed at the unit level. • One (1) corrective action performance standards attained/corrective action complete at the facility level

HW IV Corrective Action Goals			
	<i>EPA will conduct corrective action activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate. Specifically EPA has assumed the lead for corrective action at two (2) facilities, both are anticipated to become a state-lead facility.</i>		
<p>Stabilization Universe Information</p> <p>Twenty-three (23) of the forty-four (44) high-ranked CA baseline universe facilities are in the stabilization universe. That is, the stabilization measures evaluation (CA225) resulted in a finding that stabilization measures are appropriate. Stabilization measures have been imposed (CA600) at twenty-two (22) of the facilities. Stabilization construction completion (CA650) has occurred at seventeen (17) facilities.</p>			
HW 7: Long Term Goal Clean up releases	Stabilization Activities (Interim Measures) - The State will demonstrate progress towards achieving stabilization program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be on increasing the number of facilities at which current human exposures and releases to ground water have been controlled and on facilities that are ranked as “high”.	The Key Measures are the following stabilization activities: <ul style="list-style-type: none"> • CA225 - Stabilization Measures Evaluation • CA600 - Stabilization Implemented • CA650 - Stabilization Construction completed 	
	Stabilization Activities (Interim Measures) Cont’d	The following stabilization outputs are planned: FY15: <ul style="list-style-type: none"> • No (0) Stabilization Measure Evaluations. • No (0) Stabilization Implemented. • No (0) Stabilization Construction completed. 	<ul style="list-style-type: none"> • No (0) Stabilization Measure Evaluations. • One (1) Stabilization Implemented. • One (1) Stabilization Construction completed.
	<i>EPA will conduct Stabilization activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate.</i>		

HW IV Corrective Action Goals			
HW Indicator 2 The State will continue to evaluate the number and percentage of facilities with human exposures under control (CA725). Note: The definition of “under control” is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.			
GPRA Corrective Action Universe Information: There are Forty-four (44) facilities in the 2020 Corrective Action Universe. All 44 of these facilities are under control with regard to human exposure as of the end of FY14.			
HW 7: Long Term Goal Clean up releases	The state will work to get human exposure under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator.	The Key Output is the number of GPRA Baseline facilities at which human exposures are under control (CA725). The following Key Outputs are planned: FY15: <ul style="list-style-type: none"> • No (0) facility is projected to achieve this environmental indicator 	No (0) facility achieved this environmental indicator
	The State will update the facility-specific strategies, identifying when each high – ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.	The cumulative total in Colorado at the conclusion of FY15 will be 100%.	The cumulative total in Colorado at the conclusion of FY15 was 100%.
<i>EPA has a national goal of having human exposures controlled at 95% of the GPRA Baseline facilities by FY 2005 (HW-11-24)</i>	<i>EPA will work to get human exposures under control at EPA-lead facilities and will provide technical assistance as appropriate.</i>		
	<i>EPA will update facility-specific strategies, identifying when each high – ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.</i>		
HW Indicator 3 The State will continue to evaluate the number and percentage of facilities with ground water releases under control (CA750). Note: The definition of “under control” is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.			

HW IV Corrective Action Goals			
GPRA Corrective Action Universe Information: There are Forty-four (44) facilities in the 2020 Corrective Action Universe. Forty-Three (43) of these 44 are under control with regard to ground water releases as of the end of FY14.			
HW 7: Long Term Goal Clean up releases	The state will work to get the migration of contaminated ground water under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator.	The Key Measure is the number of GPRA Baseline facilities at which migration of contaminated ground water are under control (CA750). The following Key Outputs are planned: FY15: <ul style="list-style-type: none"> • One (1) facility is projected to achieve this environmental indicator. 	No (0) facility achieved this environmental indicator
	The State will update the facility-specific strategies, identifying when each high – ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.	The cumulative total in Colorado at the conclusion of FY15 will be 100%.	The cumulative total in Colorado at the conclusion of FY15 was 98%.

HW V Pollution Prevention & Compliance Assistance Goals			
EPA 2011 – 2015 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.2 Preserve Land			
HW 9: Long Term Goal Implement a compliance assistance program that increases the compliance rate within HMWMD's regulated communities.			
Short Term Goals	Objective	Measures	Results
	A schedule of quarterly compliance assistance workshops and training sessions will be established. Trainings provide compliance guidance to attendees.	Presentation of hazardous waste compliance assistance seminars, workshops, and/or training sessions: <ul style="list-style-type: none"> • Estimate 15 to 20 sessions with 1000 attendees each federal fiscal year. 	

HW V Pollution Prevention & Compliance Assistance Goals			
	Site visits will be made to provide compliance assistance to selected individual businesses that request assistance or that are identified during routine hazardous waste inspections.	Implementation of the Generator Assistance Program (GAP).	Performed 10 GAP site visits.
HW 10: Long Term Goal Implement a pollution prevention program that encourages reduction of the amount and toxicity of wastes generated through waste minimization, treatment, and recycling of hazardous wastes, thereby reducing the risks associated with waste management. Methods for tracking and quantifying the accomplishments of these efforts will continue to be developed.			
	Pollution prevention training will be incorporated into compliance assistance trainings, as appropriate.	Done in conjunction with compliance assistance.	Done
	Distribute pollution prevention information and guidance documents in response to specific requests.	Done in conjunction with compliance assistance and inspections.	Done
HW 11: Long Term Goal Integrate compliance assistance, waste minimization, pollution prevention, waste diversion, and recycling into all program activities and support waste minimization efforts statewide.			
	Develop and implement compliance assistance elements within the inspection and enforcement processes.	Provide direct compliance assistance in inspections: <ul style="list-style-type: none"> Estimate 20 inspections in each federal fiscal year. 	Compliance assistance was delivered on 197 of the 322 inspections conducted in 2015.
	Distribute pollution prevention information and guidance documents in response to specific requests.	Done in conjunction with compliance assistance.	Done
	Support and maintain the technical assistance phone system.	<ul style="list-style-type: none"> Estimate 3000 responses during each federal fiscal year. 	Responded to 1,782 calls and 255 emails.

HW V Pollution Prevention & Compliance Assistance Goals			
	On the CDPHE homepage, provide updates in the hazardous waste activities and access to current compliance assistance and pollution prevention materials and documents.	<ul style="list-style-type: none"> • Maintain homepage information and track usage by Division customers • Estimate over 1,000,000 contacts during each federal fiscal year. 	The Hazardous Waste Program page on the Division's website had 7,932 hits in 2015. This is a more specific number than we have reported in the past. In past years we have reported the hits to the Division's webpage.
<i>EPA has a goal of building Sustainable Materials Management (SMM) capacity in all Region 8 states.</i>	<i>EPA will provide SMM assistance to Colorado, as requested priorities arise.</i>	<i>Reduction of Waste disposed.</i>	
<i>EPA will continue to support the environmental Compliance Assistance Center (ECAC) for all auto service businesses that request compliance assistance information. The center is based in Colorado and is available to all states.</i>			

State Indoor Radon Grant

Mission: The State Indoor Radon Grant is used to develop effective, efficient activities that increase the awareness of radon health risks in Colorado. Emphasis is placed on raising awareness of radon issues, increasing testing rates and encouraging mitigation in response to elevated radon levels. Homeowners, local governments, realtors and builders will continue to be target groups for information about radon testing and radon-resistant new construction. Distribution of funding to local health departments, cooperative extension offices and other entities at the local level will ensure coverage throughout Colorado. Annual surveys will be conducted on measurement results, mitigation providers, builders and schools as requested by the EPA Radon Reinvigoration Strategy.

State Indoor Radon Grant Goals				
EPA 2010 – 2015 Strategic Plan Goal 1 Taking Action on Climate Change and Ensuring Air Quality, Objective 1.4 Reduce Unnecessary Exposure to Radiation				
RA 1: Long-term goal Increase radon awareness. Assure that Colorado homes continue to be tested for radon, with intervention to reduce radon risk if a test result calls for action.				
Short-term goal	Objectives	Performance measures	Milestones	Results

State Indoor Radon Grant Goals				
RA 1.1 Increase awareness, testing and mitigation of homes with elevated radon levels. Work toward adoption of more radon-resistant building codes.	Contract through the grant for products and services that improve radon awareness, testing, and mitigation in Colorado.	Number and/or percent of homes that have been mitigated for elevated radon levels.	Number of homes that have been mitigated for radon.	It is estimated that 7,500 homes in Colorado were mitigated for radon in 2014.
	Provide current information to homeowners, real estate agents, buyers, sellers, and builders about radon testing and mitigation.	Percentage of homes tested for radon.	Number of homes that have been tested for radon.	It is estimated that 30,000 homes were tested for radon in Colorado in 2014.
RA 1.2 Strengthen radon public health activities in Colorado's zone 1 (high radon potential) counties.	Work with volunteer municipalities and counties to adopt construction standards to reduce radon in residential, school, and public buildings.	Number of homes in each county that have been built using radon-resistant features.	Number of homes and schools built radon resistant and number of local governments adopting radon resistant new construction building codes	It is estimated that 600 homes, schools and other buildings were built with RRNC in 2014. Twenty-six cities and/or counties in Colorado have adopted RRNC building codes.
	<i>EPA: EPA will offer assistance in public outreach efforts, help coordinate activities of the state and the Western Regional Radon Training Center, provide support for the contracts with counties and partners that have been established and offer manpower at events.</i>			
	<i>EPA: EPA will also forward relevant information from HQ or other entities to the state. Guidance will be provided as needed on the information.</i>			

State Indoor Radon Grant Goals	
	<div>EPA: EPA will also provide support to the state in the creation of radon-related policy statements or programs such as the radon proficiency program.</div>
	<div>EPA: EPA will review annual reports submitted by the state and offer a response that assures that the work plan agreed to is being followed and goals are being met.</div>